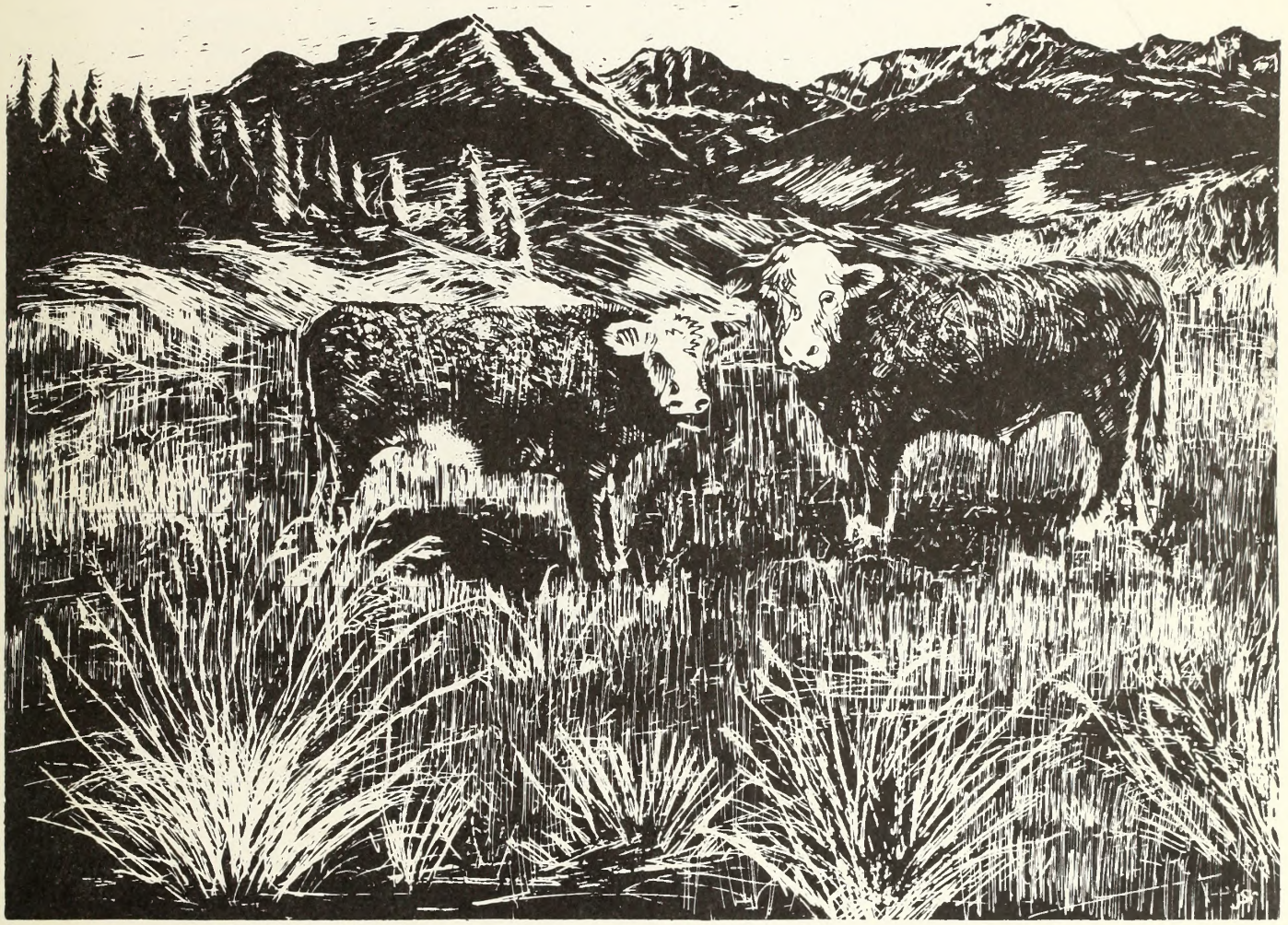
GUNNISON BASIN

Livestock Grazing Environmental Impact Statement

FINAL



U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MONTROSE DISTRICT, COLORADO

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
COLORADO STATE OFFICE
ROOM 700, COLORADO STATE BANK BUILDING
1600 BROADWAY
DENVER, COLORADO 80202

IN REPLY REFER TO
CO-922
1792

NOTICE

Enclosed is the Final Environmental Impact Statement (FEIS) for Livestock Grazing Management on the Gunnison Basin area in southwestern Colorado. The draft environmental impact statement was sent to you earlier. The FEIS consists of the comments received on the draft EIS and the responses to those comments. Since no changes in the analysis of the proposal or its impacts were required by the comments received on the draft statement, this FEIS should be used with the draft as per the final Council on Environmental Quality regulations, Part 1503.4(c).

The Montrose District Office of the Bureau of Land Management prepared the environmental impact statement pursuant to Section 102(2)(C) of the National Environmental Policy Act of 1969. The document describes and analyzes impacts that would result from the proposed livestock grazing management plan, along with five alternatives to that plan.

Thank you for your interest in this environmental impact statement.

Sincerely,

Charles W. Luscher

Charles W. Luscher
Acting State Director

FINAL
ENVIRONMENTAL IMPACT STATEMENT

(to be used with the Draft)

PROPOSED DOMESTIC LIVESTOCK GRAZING MANAGEMENT PROGRAM IN THE GUNNISON BASIN RESOURCE AREA AND AMERICAN FLATS/SILVERTON PLANNING UNIT

MONTROSE DISTRICT, COLORADO

Prepared by

Bureau of Land Management
Department of the Interior

Charles W. Luscher

Acting
State Director
Colorado State Office

Abstract: This final environmental impact statement considers a proposed action and five alternative proposals for domestic livestock grazing management on 637,277 acres of public land in the Gunnison Basin and American Flats/Silverton Planning Units administered by the Bureau of Land Management, Montrose District, in southwestern Colorado. The proposals analyze and compare different levels of livestock and wildlife vegetation allocations, methods and periods of livestock use, and rangeland improvements. The overall objective of the rangeland program is to provide multiple use management for all resources within the capacity of the total resource base.

For Further Information Contact:

Henri Bisson
EIS Project Manager
P.O. Box 1269
2300 South Townsend Avenue
Montrose, Colorado 81401

Telephone: (303) 249-7791

Comments Must Be Received By:

Type of Action: Administrative

Date EIS Made Available to the EPA and the Public:
Draft: April 14, 1980
Final:

TABLE OF CONTENTS

SUMMARY

The Bureau of Land Management proposes to implement an improved livestock grazing management program in the Gunnison Basin and American Flats/Silverton Planning Units of the Montrose District in southwestern Colorado. The area includes approximately 637,277 acres of public land and 167 livestock grazing allotments. Five alternatives and a proposed action were assessed: (1) MFP Step II/Spring Rest (proposed action), (2) Fall Rest, (3) No Action; (4) Elimination of Livestock Grazing, (5) Optimize Wildlife and Watershed Values, and (6) Optimize Livestock Grazing.

1. MFP Step II/Spring Rest (proposed action)

Under this alternative, vegetation would be allocated to livestock, wildlife, and other resources, grazing systems centered around the spring rest requirements of forage plants would be implemented, and various rangeland improvements, including up to a maximum of 97,090 acres of vegetation treatments, would be involved.

The objectives of the proposed action would be to improve rangeland conditions to provide 78,742 AUMs of livestock and wildlife forage in the short term and 111,728 AUMs of livestock and wildlife forage in the long term.

Environmental Consequences--Spring Rest

Rangeland conditions would improve, with an additional 170,965 acres in good and excellent condition, leading to improvements of vegetation, soil, and watershed conditions.

The improvements in vegetation composition and density would lead to long term reductions in runoff by a total volume of 49 acre feet over a 6 month grazing season and sediment production by 30 percent. Total erosion in the area would be reduced by 359,663 tons/year and soil compaction by 16 percent. Good condition aquatic habitat would increase by 24.6 miles.

In the short term, livestock allocations would be reduced to 44,542 AUMs (26 percent below present licensed allocations), which would reduce total annual ranch income by $1,104,600. By the long term (2005), the improvement in rangeland conditions could increase livestock allocations to 63,201 AUMs (5 percent above present allocations and 42 percent above short-term allocations) which would increase total annual ranch income by $1,327,200 above the short-term reduction.

Short-term wildlife allocations would be reduced to 34,200 AUMs, resulting in a decrease in hunter recreation days by 2,805 and hunting recreation income by $96,800. In the long term, wildlife allocations could be increased to 48,527 AUMs. This would lead to increases in hunter recreation days and hunting recreation income by 22,055 and $561,500, respectively.

2. Fall Rest

The major components and objectives of this alternative would be identical to the MFP Step II/Spring Rest Alternative except the implementation of the livestock grazing systems would be centered around the carbohydrate production and storage requirements of the forage plants.

Environmental Consequences--Fall Rest

The impacts under this alternative would be similar to those projected under the MFP/Spring Rest Alternative. A difference would be a better vegetation response (189,697 additional acres in good or excellent condition--18,732 more than under Spring Rest). The better vegetation response could lead to unquantifiable decreases in erosion rates and surface runoff beyond those predicted for the Spring Rest. Good condition aquatic habitat would increase by 34 miles.

Improvement in rangeland conditions, could increase long-term livestock allocations to 71,370 AUMs (16 percent above present allocations and 60 percent above short-term allocations) which would increase total annual ranch income by $1,942,700 above the short-term reduction. Also, long term wildlife allocations could be increased to 54,799 AUMs, which would increase hunter days by 22,055 and hunting recreation income by $561,500.

3. No Action

The alternative would not change the present livestock grazing management practices, livestock allocations would remain at their present levels, no new AMPs or rangeland improvements would be implemented, and only routine maintenance would be performed on existing rangeland improvements.

Environmental Consequences--No Action

In the short term, no significant changes would occur, however, in the long term, the present range sites in a declining trend would continue to decline. In the long term, 32,496 acres presently in good condition would be reduced to fair or poor condition. The decline in vegetation would cause slight increases in erosion and surface runoff.

In the long term, livestock vegetation allocations and therefore ranch income would remain the same. However, wildlife use would decline by 3,558 AUMs. Also, 30.2 miles of excellent condition aquatic habitat and 26.5 miles of good condition habitat could be reduced in condition class. Due to the decreases in big game animals, recreation use would decrease by 16,577 hunting use days, and hunting-related income would decline by $572,400.

4. Elimination of Livestock Grazing

Under this alternative, all livestock grazing use would be eliminated on public lands administered by the Bureau of Land Management in the Gunnison Basin.

All vegetation would be allocated to wildlife, watershed, recreation, and other uses, approximately 34,824 acres of vegetation treatments would be implemented to improve wildlife and watershed values.

Environmental Consequences--Elimination of Livestock Grazing

This alternative could cause a substantial number of livestock operations to go out of business while others, who are less dependent on public land for livestock grazing, would have to reduce operations or provide livestock forage through additional private land or increase supplemental feeding. The elimination of livestock use on public lands would reduce total annual ranch income by $5,949,900.

Rangeland conditions would improve, with an additional 255,280 acres in good and excellent condition. The improvements in vegetation density and composition would lead to long-term reductions in runoff by a total volume of 105 acre feet over a 6 month grazing season and sediment production by 66 percent. Total erosion in the area would be reduced by 629,410 tons/year and soil compaction by 33 percent. Good and excellent aquatic habitat would increase by 28.4 miles and 26.5 miles, respectively.

Long-term wildlife allocations could be increased to 96,848 AUMs, which would lead to increases in hunter recreation days by 45,023 and hunting recreation income by $1,554,700.

5. Optimize Wildlife and Watershed Values

This alternative would allocate vegetation to livestock, wildlife, watershed, and other resources, with the "overlap" vegetation (that utilized by both livestock and wildlife) allocated to wildlife.

The objectives of this alternative would be the same as those described for the proposed action. The livestock grazing management program would follow the spring rest proposal, and 111,458 acres of vegetation treatment are proposed to minimize soil erosion, especially, accelerated erosion, increase plant density, expand crucial wildlife winter habitat, and improve watershed values.

Environmental Consequences--Optimize Wildlife and Watershed Values

Rangeland conditions would improve with an additional 258,045 acres in good and excellent condition. The improvements in vegetation would lead to long term reductions in runoff by a total volume of 72 acre feet over a 6 month grazing season and sediment production by 52 percent. Total erosion in the areas would be reduced by 539,494 tons/year and soil compaction by 26 percent. Good and excellent condition aquatic habitat would increase (by 66.2 miles and 7.6 miles, respectively).

In the short term, livestock allocations would be reduced to 20,745 AUMs (65 percent below present licensed allocations), resulting in a reduction in total annual ranch income of $3,100,800. Long-term improvements in rangeland conditions could increase livestock allocations to 34,403 AUMs (43 percent below present licensed allocations and 66 percent above short-term allocations), which would increase total annual ranch income by $1,293,100 over the short-term reduction, resulting in a net reduction of $1,807,700 over the present situation.

Short-term wildlife allocations would be increased to 57,983 AUMs. This increase in AUMs would not cause an immediate increase in hunter days, since it would take several years for wildlife herds to increase. In the long term, wildlife allocations could be increased to 98,977 AUMs. This would lead to increases in hunter recreation days by 45,023 and hunting recreation income by $1,554,700.

6. Optimize Livestock Grazing

This alternative would allocate vegetation to livestock, wildlife, and other resources, with the "overlap" vegetation allocated to livestock.

The objectives of this alternative would be the same as those described for the proposed action. The livestock grazing management program would follow the spring rest proposal, and 201,955 acres of vegetation treatment are proposed to maximize livestock vegetation.

Environmental Consequences--Optimize Livestock Grazing

Rangeland conditions would improve, with an additional 153,374 acres in good and excellent condition. The improvements in vegetation composition and density would lead to long term reductions in runoff by a total volume of 45 acre feet over a 6 month grazing season and sediment production by 26 percent. Total erosion in the area would be reduced by 359,663 tons/year and soil compaction by 17 percent. Aquatic habitat condition would decline (30.2 fewer miles in excellent condition and 39.7 fewer miles in good condition).

In the short term, livestock allocations would be increased to 61,356 AUMs (2 percent above present licensed allocation), resulting in an increase in total annual ranch income of $350,400. Long-term improvements in rangelands could increase livestock allocations to 92,389 AUMs (54 percent above present licensed allocations), resulting in an increase in total annual ranch income of $1,910,700 over the short-term increase.

Short-term wildlife allocations would be reduced to 17,386 AUMs, which would reduce hunting recreation days by 39,105 and hunting recreation income by $1,350,300. Long-term wildlife allocations could be increased to 26,180 AUMs. However, it is anticipated that the increase in AUMs would not lead to any appreciable long-term increases in hunter recreation days or income.

Conclusion

In conclusion, the benefits to all resource values are weighted against the adverse impacts to all resource values in all the alternatives. The MFP/Spring Rest and the Fall Rest alternatives have been shown to have the greatest amount of benefits to all resources for the least amount of adverse impacts. Since the MFP/Spring Rest Alternative has been formulated through the BLM planning system, it is the Bureau's proposed action for the Gunnison Basin EIS area. However, there would be some differences in impacts between the spring rest and fall rest alternatives. A better predicted vegetation response would occur with the Fall Rest Alternative, which would lead to increased wildlife and livestock allocations and ranch incomes. A combination of these two alternatives could provide added flexibility to the rangeland management program and the net effect could be a more balanced program with fewer adverse impacts than either the spring rest or fall rest alternatives used as a blanket approach. Therefore, a combination of these two alternatives would be the preferred course of action.

CONSULTATION AND COORDINATION

The Gunnison Basin Livestock Grazing Environmental Impact Statement was prepared by a multidisciplinary team in the BLM Montrose District, Colorado. The actual writing of the EIS began in June of 1979. However, for more than a year prior to that point, various pre-EIS studies and coordination efforts were carried out.

During the spring, summer, and fall of 1978, intensive rangeland inventories were carried out in the Gunnison Basin. These inventories are detailed in Appendix RM-2 (page 195, Draft).

The land use planning (Management Framework Plan) update for the EIS area was initiated during the fall of 1978. Public meetings were held in Lake City, Gunnison, Silverton, Montrose, and Denver to identify issues and concerns for the planning effort. The scheduling and purpose of these meetings were outlined in press releases to the local media. During this period, coordination meetings were also held for local, state, and federal agencies.

In May of 1979, scoping/planning meetings were held in Lake City, Gunnison, Silverton, Montrose, and Denver in conjunction with completion of the MFP Step II. Prior to the meetings, notice of intent to hold scoping meetings and prepare an EIS was published in the Federal Register and local media. Also prior to the meetings, a summary of the MFP Step II recommendations was sent to interested federal, state, and local agencies, livestock grazing advisory board, and interest groups, and to all livestock permittees in the EIS area.

Response to the scoping meetings was good, and helped a great deal in formulating the proposed action for the EIS.

Prior to and during the EIS writing process, specific consultation was initiated with several state and federal agencies. Wildlife herd sizes and distribution were coordinated with the Colorado Division of Wildlife. The State Historic Preservation Officer reviewed the draft materials in view of possible impacts to cultural resources.

The U.S. Fish and Wildlife Service was consulted concerning any threatened or endangered plants or animals. The FWS responded that no such species would likely be affected. Coordination with the Forest Service has been an on going process, since a number of livestock permittees also hold Forest Service permits. The soil type mapping phase of the rangeland inventories was coordinated with the Soil Conservation Service.

The Draft Environmental Impact Statement was made available to the public on April 14, 1980. (Notice of availability was published on April 11, 1980 in the Federal Register, press releases were also sent to local media.) Copies of the Draft were sent to and comments requested from the agencies, interest groups, and individuals listed on Table 1.

During the 65 day comment period (April 14, 1980 to June 17, 1980) public hearings on the adequacy of the EIS were held in Montrose (May 19), Lake City (May 20), and Gunnison (May 21). All comment letters and public hearing comments were reviewed and considered in preparation of the Final Environmental Impact Statement. The entire text of all letters received and all comments made at the public hearings is printed in this volume. Those comments to which a response was made are noted, and the response appears opposite the corresponding comment.

TABLE 1

LIST OF AGENCIES, ORGANIZATIONS, AND PERSONS
TO WHOM COPIES OF THE
ENVIRONMENTAL IMPACT STATEMENT WERE SENT
(* indicates a response received)

Federal Agencies

- Advisory Council on Historic Preservation
- Department of Agriculture
  - Forest Service *
  - Soil Conservation Service
- Department of Energy
- Department of the Interior
  - U.S. Fish and Wildlife Service
  - Water and Power Resource Service
  - Heritage Conservation and Recreation Service *
  - Geological Survey
  - Bureau of Mines
  - National Park Service
- Environmental Protection Agency *

State Agencies

- Governor's Clearing House--Colorado
  - Division of Water Resources *
  - Colorado Geological Survey *
  - Division of Wildlife *
  - Colorado Historical Society *

Local Agencies

- County Commissioners
  - Gunnison County *
  - Hinsdale County
  - San Juan County
  - Saguache County
  - Montrose County
- District 10 Regional Planning Commission *
- Towns and Cities
  - Crested Butte *
  - Dove Creek
  - Durango
  - Gunnison
  - Lake City
  - Montrose
  - Mt. Crested Butte
  - Ouray
  - Ridgway
  - Silverton

Other Organizations and Individuals

- Sierra Club
- Colorado Open Space Council
- Izaak Walton League
- The Wildlife Society
- Colorado Cattlemen's Association *
- Colorado Wool Grower's Association
- Audubon Society
- Natural Resources Defense Council *
- Society for Range Management
- BLM Livestock Grazing Advisory Board, Montrose District
- Wilderness Society
- Rocky Mountain Center on Environment
- Trout Unlimited
- Ada County Fish and Game League
- Nevada Outdoor Recreation Association
- Oregon Environmental Council
- National Council of Public Land Users *
- Gunnison County Stockgrowers, Inc. *
- National Wildlife Federation *
- Colorado Open Space Council (Wilderness Workshop) *
- Taylor Park Cattle Pool *
- Iola-Powderhorn Stockgrowers Association *
- All Livestock Grazing Permittees in the EIS Area *
- Various Individuals Who Have Requested Copies of All BLM Environmental Documents

WRITTEN COMMENTS

The following are written comments received from individuals, groups, and government agencies concerning the Draft Environmental Impact Statement.

Letters and statements from the public hearings are numbered in the order in which they were received. Each contribution is numbered and, where necessary, its parts are also numbered. All parts are numbered in the left hand margin of the letter with corresponding answers appearing to the right of the reproduced letter. Not all letters required a response.

For comments received at the public hearings, pertinent parts are quoted and corresponding answers appear to the right. The full text of these comments has been recorded and is available at the Montrose District Office.

The order of written comments received by BLM is as follows:

Letter Number	Individual, Group, or Agency
1*	Colorado Geological Survey
2	Colorado Division of Water Resources
3	George Gehrke
4*	Colorado Historical Society
5	George Gehrke
6	Environmental Protection Agency
7	Ochs Brothers
8	Clinton D. Nagel
9	Natural Resource Defense Council
10	District 10 Regional Planning Commission
11	County Commissioners, Gunnison County, Colorado
12	USDI Heritage Conservation and Recreation Service
13	Gunnison County Stockgrowers Association
14	Ochs Brothers
15	National Wildlife Federation
16	Town of Crested Butte
17	USDA Forest Service
18	Colorado State University, Department of Range Science
19	National Council of Public Land Users
20	Wilderness Workshop of the Colorado Open Space Council
21	State of Colorado, Division of Wildlife
22	U.S. Representative Ray Kogovsek

*No response made by BLM.

Department of Local Affairs
Colorado Division of Planning
Philip H. Schmuck, Director

Richard D. Lamm, Governor

May 21, 1980

Mr. Henri Bisson
Bureau of Land Management
Gunnison Basin EIS Project Manager
P. O. Box 1269
Montrose, Colorado 81401

SUBJECT: Draft Environmental Impact Statement
Gunnison Basin Livestock Grazing

Dear Mr. Bisson:

The Colorado Clearinghouse has received the above-referenced draft Environmental Impact Statement and has distributed it to interested state agencies. Comments received from the Division of Water Resources and the Colorado Geological Survey are enclosed for your information.

Thank you for the opportunity to review this matter.

Sincerely,

S O Ellis

Stephen O. Ellis
Chief Planner

SE/SN/vt
Enclosures

cc: Office of the Governor
Department of Natural Resources

520 State Centennial Building, 1313 Sherman Street, Denver, Colorado 80203 (303) 892-2351

STATE OF COLORADO

RICHARD D. LAMM
Governor

JOHN W. ROLO
Director

COLORADO GEOLOGICAL SURVEY
DEPARTMENT OF NATURAL RESOURCES
715 STATE CENTENNIAL BUILDING – 1313 SHERMAN STREET
DENVER, COLORADO 80203 PHONE (303) 839-2611

May 5, 1980

Mr. S. O. Ellis
Colorado Clearinghouse
Colorado Division of Planning
Rm. 520, 1313 Sherman Street
Denver, CO 80203

Dear Mr. Ellis:

RE: BLM GUNNISON BASIN
LIVESTOCK GRAZING
DRAFT EIS

We have received and reviewed this EIS.

Generally this EIS appears adequate to address the environmental problems caused by grazing in the Gunnison Basin. Except in areas where land is severely overgrazed, grazing usually has little effect on active geologic process or is little affected by geologic conditions. Therefore we have no geology-related basis for objection to its acceptance.

Sincerely,

James M. Soule

James M. Soule
Engineering Geologist

JMS/gp

GEOLOGY
STORY OF THE PAST . . . KEY TO THE FUTURE

RICHARD D. LAMM
Governor

J. A. DANIELSON
State Engineer

2

DIVISION OF WATER RESOURCES

Department of Natural Resources
1313 Sherman Street - Room 818
Denver, Colorado 80203
Administration (303) 839-3581
Ground Water (303) 839-3587

May 15, 1980

MAY 15 1980

DIV. OF PLANNING

MEMORANDUM

TO: STEPHEN O. ELLIS, COLORADO CLEARINGHOUSE

FROM: HAL D. SIMPSON, CHIEF, WATER MANAGEMENT BRANCH

SUBJECT: GUNNISON BASIN LIVESTOCK GRAZING DRAFT ENVIRONMENTAL IMPACT STATEMENT

We appreciate the opportunity to review and comment on the Draft Environmental Impact Statement for the Gunnison Basin Livestock Grazing plan. The statement adequately addresses the impacts on water resources through the livestock grazing management program as stated under the proposed action (MFP Step II/Spring Rest). Any wells or livestock water tanks for water development purposes would require an application be submitted to our office and the issuance of the proper permit.

As stated on page 19 of the draft, the development of 181 springs is proposed under the proposed action. This spring development would also require a well permit if and when the historic flow in the spring is increased through the proposed development.

2-1 The statements on page 37 concerning the State Engineer's Office need to be revised. Our office processes applications for stock water tanks and wells, but not applications for water rights. Applications for water rights are filed in and adjudicated by the Division Water Court with advisement from the State Engineer.

We have no objection to the management plan provided the plan is conducted in accordance with all applicable state water statutes.

Hal D. Simpson

HDS/JMS:mvf

cc: Ralph Kelling, Div. Eng.

Comment	Response
2-1	See text change indicated on errata sheet.

G. Gehrke - The Fly & Gun Bench

DRAWER 1204, SALIDA COLO. 81201
303 - 539-3990

RECEIVED
MAY 27 '80

HENRI BISSON : 21 MAY 80
EIS PROJECT MANAGER
P.O. BOX 1269
MONTROSE, COLORADO 81401

SUBJECT: INPUT ON "PROPOSED DOMESTIC LIVESTOCK GRAZING MANAGEMENT PROGRAM IN THE GUNNISON BASIN RESOURCE AREA AND SILVERTON PLANNING UNIT."

GENTLEMEN:

AS REQUESTED, WE ARE SUBMITTING A WRITTEN FORM LETTER ON THE POINTS TO BE CONSIDERED AND REMEMBERED FOR PERMANENT FILING IN YOUR RECORDS OF THE PUBLIC HEARINGS ON WHICH I SPOKE. DUE TO THE LATE DELAY OF NOTICE, WE ARE NOW SUBMITTING THAT REPORT TO BE CONSIDERED BY YOUR OFFICES. PLEASE CONSIDER:

IN 1978: 5,970 RETURNS FROM 9,790 LICENSED FISHERMEN WERE RECIEVED BY LLOYD HAZZARD, DIV. OF WILDLIFE. SUBJECT: 1978 FISHING QUESTIONAIRE DEALING WITH THE GUNNISON/COUNTY AREA. FIGURES HERE CONCERN IMPACT ON GUNNISON COUNTY ONLY.

DATA RECORDED WAS PROCESSED BY COLORADO UNIVERSITY COMPUTOR CENTER:

THIS 1978 RESEARCH RECENTLY VERIFIES: 548,200 FISHERMEN DAYS WERE INVESTED IN "GUNNISON COUNTY" ALONE.

THE COST "PER FISHING DAY" FO PURSUE THE SPORT OF FISHING PER FISHERMAN IS $38.36.

FISHING ALONE PROVIDED A GROSS TAXIABLE INCOME TO GUNNISON COUNTY OF $21,028,952.00.

DIV. OF WILDLIFE RESEARCH FROM ROHDY AND LOVEGROVE (1970) SHOWS THAT THE MULTIPLIER FOR HUNTING AND FISHING IN GRAND COUNTY, COLORADO WAS 2.0 TIMES THE ORIGINAL EXPENDITURES. I.E. EACH DOLLAR IS REUSED TWICE BEFORE IT LEAVES AN ECONOMIC SOCIAL CENTER. THIS IS A "RETAXIABLE INCOME."

FISHING, THEREFORE PROVIDED A GRAND TOTAL OF $42,057,904.00 IN TAX INCOME (STATE, COUNTY, CITY, ETC, 6%) FOR A TOTAL OF $2,523,474.24. INCLUDING THE FEDERAL TAXES RECIEVED ON CERTAIN FISHING EQUIPMENT USED.

ALL THESE MONIES ARE WITHIN THE BOUNDRIES OF THE STATE OF COLORADO ONLY. NATIONALLY, THE FIGURES ARE HIGHER.

BUT, THE UNDERLAYING FACT OF THE MATTER MOST FAIL TO RECOGNIZE IS, "ITS IMPOSSIBLE TO HAVE GOOD TROUT AND GENERAL FISHING UNLESS YOU HAVE GOOD BIG GAME HABITAT ABOVE IT."

THE LESSER ITS QUALITY THE GREATER ITS IMPACT ON QUANITY IN DECREASED DESIRES OF THE PUBLIC TO FISH HERE,...THE GREATER THE SILTATION AND A MULTITUDE OF OTHER ADVERSE AFFECTS THAT INFLUENCE FISH EVEN IF SILTATION NEVER REACHES DAM SITES.

IN SHORT, MONEY IS ELIMINATED FROM EVERY LOCAL CITIZENS BANK ACCOUNTS.

OVERGRAZING AND CATTLE ARE AN ADVERSE AFFECT, PROVEN SCIENTIFICALLY, ON THE PUBLICS RIPARIAN ZONES.

G. Gehrke - The Fly & Gun Bench

DRAWER 1204, SALIDA COLO. 81201
303 - 539-3990

THE FOLLOWING ON THE WAPITI IS FROM: THE 1979 D.O.W. ACCOUNTING AND RESEARCH REPORTS: PUBLIC RECORDS AND "THE FINAL RESEARCH REPORT FROM DEPARTMENT OF ECONOMICS, COLORADO STATE UNIVERSITY TO COLORADO D.O.W. BY R.A. WYKSTRA & PETER ASHTON; "OPTIMUM WILDLIFE RECREATION SUPPLIES IN COLO."

FOR EXAMPLES ONLY, AS THE STATE WIDE FIGURES ARE MUCH TO STAGGERING FOR EVEN MOST PROFESSIONAL OFFICIALS TO CONCIEVE, BUT TRUE THEY ARE:

UNIT #66: 952 NON RESIDENTS X $135.00 EA. ELK LIC. ....= $128,520.00
UNIT #67 540 X . ....= 72,900.00
UNIT #66 1,159 RESIDENT X $16.00 EA. ELK LICENSE .....= 18,544.00
UNIT #67 1,923 .....= 30,768.00
UNIT #54 50 NON RES X $135.00 EA ELK LIC. .....* 6,750.00
UNIT #54 839 RESIDENT X $16.00 EA ELK LICENSE .....= 13,424.00

ELK TOTAL LICENSE INCOME TO THE STATE OF COLORADO $270,906.00
AND THIS IS ON JUST THREE UNITS.

WHAT WAS THE TOTAL ELK VALUES HARVESTED ON ONLY 2 OF THESE UNITS THAT WAS DIRECTLY RECIEVED BY THE PEOPLE OF THE STATE OF COLORADO?

UNITS # 66 & UNIT #67 PROVIDED 949 ELK HARVESTED.

THE VALUE OF AN ELK TO THE STATE OF COLORADO, HARVESTED OUT OF A GOOD INVENTORY HERD THAT "DRAWS HUNTERS" WHO SUPPLY THESE MONNIES IS (SEE WYKSTRA ASHTON REPORT, PAGE 9.., PRODUCT LINE NUMBER 2, CORRECTED FOR COST OF INFLACTIONARY PRICE INDEX, BUREAU OF LABOR STATISTICS,...BUT ROUNDED OFF TO A MUCH LOWER FIGURE FOR SIMPLICITY) FOR EACH 5 HUNTERS, ONE GOT AN ELK. ONE VALUE OF A 1971 REC. DAY WAS 266.00 TO HUNT AN ELK. TODAY, ITS OVER $391.82 TIMES 5 = $1,959.10 TIMES FIVE DAYS TO BAG ONE ELK BY THESE FIVE HUNTERS =$9,795.50.... THE VALUE OF ONE ELK TO THE STATE OF COLORADO.

THE ROUNDED OFF FIGURE IS $10,000.00 BECAUSE OF INSAFFICIENT TIME TO UPDATE THE LARGE NUMBER OF MONTHS OF INFLATION NOT ACCOUNTED FOR. $10,000 IS REASONABLE, THEREFORE AND BELOW THE PLAY FOR IMPRESSIONS, (AND SAFE, ALSO)

949 WAPITI X $10,000.00 = $9,490,000.00 SPENT BY 5,463 SPORTSMEN, WHICH PROVIDED THE STATE OF COLORADO WITH THE REUSE FACTOR OF 2 WITH $18,980,000.00 OF INCOME AND REUSE OF THE NINE AND A HALF MILLION IN THE FIRST PLACE. WHAT THEREFORE WAS THE TAXIABLE INCOME RECIEVED IN TOTAL BY ALL OUR GOVERNEMENT AGENCIES FROM THE FEDERAL TO THE LOCAL LEVEL?

IT WAS A MINIMUM OF $1,138,800.00 DOLLARS IN TAXES.

NOT ONLY DID JUST TWO ELK UNITS DO THIS FOR YOU, BUT AN ITEM THAT EVERYONE SEEMS TO FORGET OR DOESN'T REALIZE IS THAT WITH A COUNTY POPULATION OF APPROXIMATELY 8,000, THESE HUNTERS INCREASED THE SPENDING FORCE TEMPORARILY BY 5,463 FOR A TOTAL OF 13,463 CITIZENS...,AND THIS DOESN'T INCLUDE THE OTHER BIG GAME SPECIES IN THE BARGAIN,...BIG OR SMALL, OR THE FISHES, OR THE HIKERS, OR ETC. ETC.

GRAZING AND CATTLE THEREFORE ARE NOT THE PRIMARY ASSETS OF GUNNISON COUNTY. WILDLIFE, AND THE COLLEGE ARE, FOR EXAMPLE. BUT OUR PUBLIC LAND WHEN USED FOR WILDLIFE IS THE PRIMARY INCOME SOURCE FOR THE ENTIRE GUNNISON BASIN, PERIOD.

WE VIOLENILY OBJECT TO THE OVERAL 11% DECREASE OF OUR ELK HERDS. IT'S NOT ONLY A GROSS MISMANAGEMENT OF PUBLIC TRUST, BUT ECONOMICALLY STUPID IN THE BARGAIN.

The "MARRYAT"
World's Finest Reel

GG
G. Gehrke - The Fly & Gun Bench
DRAWER 1204, SALIDA COLO. 81201
303 - 539-3990

WHAT WAS THE TOTAL VALUE OF YOUR DEER HARVESTED TO GUNNISON COUNTY, GUNNISON BASIN, AND THE STATE OF COLORADO? ON ONLY TWO UNITS. UNITS 66 & UNIT 67?

UNIT 66 : 175 DEER WERE HARVESTED (D.O.W. 1979 RECORDS GUNNISON OFFICE)
UNIT 67 : 99 DEER WERE HARVESTED
274 TOTAL DEER WERE TAKEN OUT OF THE HERD INVENTORY

274 TIMES THE VALUE OF ONE DEER IS $3,435.75 = $941,395.50
WHICH PROVIDED A NET TAX INCOME WITHIN THIS STATE OF $1,882,791 TIMES 6% = $112,967.46 DOLLARS.

IT MAKES NO DIFFERENCE IN THE "QUIBBLING SENSE OF THE WORD" WHERE ALL THIS MONEY IS FILTERED. IT ONLY MATTERS THAT IT IS CREATED AND SPENT AND RECIEVED TOTALLY WITHIN THE BOUNDRIES OF THE STATE OF COLORADO.

THESE SAME UNITS PROVIDED YOU WITH 1,699 NON-RESIDENT HUNTERS AND 3,082 RESIDENT HUNTERS WHO CAME HERE TO SPEND "THERE" MONEY WITH YOU. IN ADDITION TO PUTTING AN ADDITIONAL $134,262 INTO YOUR STATE D.O.W. MANAGEMENT FUNDS SO YOU ARE ABLE....AS A PEOPLE, TO "MAINTAIN YOUR MARKETABLE COMMODITY... ...."WILDLIFE."

THESE SPORTSMEN WANT TO COME BACK AND DO BUSINESS WITH YOU .....AND IN EVER INCREASING NUMBERS. YES, NOT ONLY THIS YEAR, BUT THE YEAR AFTER THAT, AND THE YEAR AFTER THAT AND .....

WHEN RESEARCH SHOWS THAT WHAT ONE COW EATS OFF OUR PUBLIC LANDS ELIMINATES THE HABITAT THAT WOULD SUPPORT 3.1 ELK OR 6.2 DEER PER ANIMAL UNIT MONTH. (NOT DURING THE ENTIRE GRAZING SEASON) IS IT ANY WONDER THAT THE WELFARE OF THE ENTIRE POPULATION OF THE UNITED STATES SHOULD BE CONSIDERED FIRST AND NOT THE WELFARE OF JUST A FEW AT THE GREATER EXPENSE OF THE MAJORITY.

THAT 125 RANCH FAMILIES CANNOT BE ALLOW TO DICTATE PUBLIC POLICY TO THE MAJORITY.

UNIT 66, 67, & 52 PROVIDED ONLY ONE DOZEN BEAR TOTALLY.

INSIGNIFICANT, WE CAN ASK?

HARDLY.

WITHOUT COUNTING THE VALUE OF A SINGLE RECREATION DAY THESE WONDEROUS ANIMALS ARE WORTH AND WHAT EACH BEAR HUNTER SPENDS EA DAY TO DO THIS SPORT, THERE WERE 1,376 OF THESE DAYS SPENT IN THIS COUNTY AREA ALONE BY ONLY 180 HUNTERS.

REGARDLESS, 12 HARVESTED BEAR MADE US $120,000.00 BECAUSE THE VALUE OF ONE BEAR HAPPENS TO BE OVER $10,000.00 TODAY.....EACH.

ALL OF US RECIEVED A TOTAL OF $14,400.00 IN TAX BENEFITS AND THIS MEANS ALL OF OUR GOVERNMENTS. THIS IS A LOT OF MONEY.

HOWEVER; THE PEOPLE, RECIEVED THE GROSS. ALL IN HARD, COLD, CASH.

INCIDENTLY, 30 HUNTERS WERE NON-RESIDENTS AND 150 WERE RESIDENTS. HUNTING BEAR IS A HARD, GRUELING AND DEMANDING EXPENSIVE SPORT. BOTH IN TIME AND MONEY.

the "Trout Snatchers"

GG
G. Gehrke - The Fly & Gun Bench
DRAWER 1204, SALIDA COLO. 81201
303 - 539-3990

WILDLIFE AND OUTDOOR RECREATION IS BIG BUSINESS,...BIGGER THAN WHAT ANYONE HAD EVER IMAGINED BEFORE:

CONSTRUCTIVLEY, I COME TO POINT OUT A VITAL ISSUE THAT SHOULD, AND INDEED MUST BE CONSIDERED IF THIS GRAZING IMPACT STATEMENT IS TO BE BALANCED MOST PROFITABLY IN BEHALF OF THE MAJORITY. AS IT IS WRITTEN NOW...,IT FAVORS THE MINORITY.....AND A GREEDY MINORITY AT THAT, WHICH WILL USE ANY TACTIC AVAILIABLE TO THEM TO RUIN, NOT ENHANCE THE ENVIORNMENT. ANYTHING, THAT WILL PUT FAVORED DOLLARS IN THERE POCKETS AT UNFAIR PRICES AND ESPECIALLY WITH UNJUST TRADEOFFS.

I CANNOT SEE HOW THIS VIEW AND FACT CAN EVER BE CONTESTED IN HONESTY.

SO IT IS, THAT WE SUBMIT, THAT IF THE BEST INTEREST OF OUR PUBLIC AND OUR PEOPLE IS TO BEST SERVED, AND IF INDEED OUR DEPARTMENT OF INTERIOR IS INTERESTED IN DOING THE BEST JOB FOR OUR CITIZENS, I MAINTAIN IT MUST CONSIDER THIS.

THIS GRAZING ENVIRONMENTAL IMPACT STATEMENT SHOULDN'T BE INITIATED IN ITS PRESENT FORM BECAUSE IT DOES NOT TAKE INTO ACCOUNT THE HIGHER AND MORE IMPORTANT SOCIAL-ECONOMICAL VALUES OF WILDLIFE TO THE CITIZENS.

THIS STATEMENT OF ENVIORNMENTAL IMPACT CANNOT BE PROPERLY ACTED UPON UNTIL THE ENVIORNMENTAL, ECONOMICAL IMPACT OF OUR OUTDOOR RECREASTIONAL DOLLARS, THAT DIRECTLY AFFECT ALL CITIZENS AND THE BUSINESS COMMUNITY IS DETERMAINED AND ACCURATELY ASSESSED.

AS AN AFTER THOUGHT, UNTIL THESE PUBLIC RECREATIONAL DAMAGES CAN BE ACCOUNTED FOR,...NO GRAZING ACTION SHOULD BE ALLOWED ON OUR PUBLIC LANDS.

I SUBMIT AN ATTACHED SHEET FOR REVIEW OF THESE VERY SOUND AND PROVEN PRINCIPLES.

IN ITS PRESENT FORM, WE VOTE FOR THE ELIMINATION OF LIVESTOCK GRAZING.

GG/GG

SINCERELY,

GEORGE G. GEHRKE
PRESIDENT

CC GOVERNOR LAMM
DENVER POST
REP: RAY KOGOVSEK
GUNNISON COUNTRY TIMES
JACK GRIEB: DIRECTOR D.O.W.

GG

G. Gehrke - The Fly & Gun Bench

DRAWER 1204, SALIDA COLO. 81201
303 - 539-3990

21 MAY 80 PAGE 5

FOR EACH RANCHER OUT OF A MINORITY OF 125 FAMILIES, THIS IS THE DAMAGE DONE TO THE PEOPLE OF THE UNITED STATES AND OF COLROADO AND OF THE GUNNISON BASIN.

FOR $1.86 A MONTH, YOU (THE BLM) ARE ALLOWING THE ELIMINATION OF THE MORE VALUABLE ELK, $10,000.00 EA. EACH COW ELIMINATES 3.1 ELK.

THIS IS A VALUE OF $31,000.00 DOLLARS, NOT INCLUDING TAXES, THAT ARE LOST FROM THE PEOPLE.

THERE IS NO EXCUSE FOR SUCH MISMANAGEMENT OF PUBLIC FUNDS.

THE FACTS ARE, THAT THE MORE PEOPLE THAT PAY TAXES, THE STRONGER OUR LOCAL AND STATE GOVERNMENTS.

RANCHERS ARE KNOWN TO BE THE LOWEST TAX PAYERS IN THE COUNTRY. LIKE IT OR NOT, WITH THEIR TAX WRITE OFFS, ITS A CLASSIC CASE.

THE MORE WE CAN GET A GREATER NUMBER OF TAX PAYERS USING OUR LANDS ON A TEMPORARY BASIS, THE SOUNDER THE MANAGEMENT. NOTHING DOES THIS BETTER THAN OUTDOOR RECREATION.

IF WE WERE TO ASK A RANCHER IF WE COULD GRAZE OUR COW ON HIS RANCH FOR ONLY $1.86 A MONTH, HE WOULD THROW US OFF HIS PLACE SO FAST OUR HEADS WOULD SWIM.

WE NEEDD TO CONVERT OUR SURPLUS GRAIN INTO CATTLE. WHERE ARE THE GRAIN GROWERS "FREE RIDE?"

RANCHERS SWEAR THEY MAKE ONLY 5% ON "THEIR INVESTMENTS IN CATTLE," YET, THEY CONTINUE TO USE THE PUBLIC. AND THIS IS WHAT THE PUBLIC PAYS.

FOR A 1,000 POUND COW. (THE SAME FOR SOME ELK) WE TAKE HIS $1.86 PER AUM. WE IN TURN LOSE OVER 3.1 ELK. ($31,000 WORTH) AND IF ITS TWO MONTHS, WE LOSE $62,000. AND IF ITS 3 MONTHS OF GRAZING, WE LOSE $93,000.00 DOLLARS.

FOR ALL OF THESE VAST WASTES, HE WILL RECIEVE A $50 DOLLAR PROFIT.

THE MINORITY MAKES LITTLE, BUT THE MAJORITY LOSES MUCH.

THIS IS NOT WIZE OR STRONG MANAGEMENT. ITS A POLICY THAT NOT ONLY COSTS THIS COUNTRY, BUT WEAKENS IT IN A TIME OF VITAL AND DESPARATE NEED.

IN ADDITION TO ALL THESE LOSES, THE MAJORITY OF THESE MINORITY RANCHERS HAVE SHUT OFF PUBLIC ACCESS TO OUR OWN PUBLIC LANDS. TO GOOD FISHING,....ALL IN THE NAME OF "HERITAGE".

WELL, "HERITAGE," IS NOT A FREE LICENSE TO STEAL LEGALLY.

I HEARD MANY RANCERS STATE, THE TERM, "GRAZING RIGHTS," THIS IS NOT CORRECT. THE PEOPLE HAVE GIVEN A "GRAZING PRIVLEGE." A PRIVILEGE THAT IS GIVEN SHOULD, IN THIS CASE,...BE TAKEN AWAY. ITS COSTLY, AND TIMES HAVE CHANGED. WE HAVE NOT MORE LAND, BUT YEARLY, LESS OF IT.

CATTLE SHOULD BE USED ONLY ON OCCASSIONS TO HELP MANAGE GRAZES THAT HAVE SQUEEZE OUT WILDLIFE SAGE.

STRANGE THING TO SAY? HARDLY.

CATTLE ALSO DO REPITABLE DAMAGE ON THE LOWER 10% WINTER RANGE, AND WHEN NOT AVAILIABLE FOR WILDLIFE, THEY SUFFER LARGE WINTER KILLS. THIS IS ALSO A LARGE WASTE DIRECTLY THE FAULT OF THE BLM AND THE DEPT. OF INTERIOR.

NO MATTER HOW WE CUT IT, WILDLIFE AND OUTDOOR RECREATION MUST BE GIVEN PRIORITY OVER CATTLE. THE TIME IS LONG OVERDUE AS WE WILL CONTINUE TO WASTE PUBLIC DOLLARS UNTIL COURAGE AFFIRMS THIS FACT TO BE TRUE. THE PEOPLE DESERVE IT.

The economic figures for wildlife and livestock presented in the Draft EIS were taken from studies and computer programs developed by Colorado State University.

The wildlife objectives of the MFP were designed to manage wildlife habitat in support of well balanced populations for game as well as nongame species within the multiple use concept. If one were to assess the management of the EIS area solely on a single use basis, whether it be wildlife, recreation, wilderness, mining, livestock, or subdivision, the economics of that single use could be made to look quite favorable, however, the BLM is a multiple use agency and any land use plans will strive to achieve a balance between all resource values.

It is not the management philosophy of the BLM to manage wildlife habitat solely to "sell licenses", nor does the BLM believe the Colorado Division of Wildlife manages wildlife solely to "sell licenses". In general, DOW supports the Draft EIS and specifically supports several of the alternatives, including the proposed action. See

comment letter number 21.

Department of Local Affairs
Colorado Division of Planning
Philip H. Schmuck, Director

Richard D. Lamm, Governor

MEMORANDUM

RECEIVED June 2 '80 B.L.M. Montrose Dist.

TO: BUREAU OF LAND MANAGEMENT
Attn: Henri Bisson

FROM: Stephen O. Ellis
State Clearinghouse

SUBJECT: ADDITIONAL COMMENTS
Draft Environmental Impact Statement
Gunnison Basin Livestock Grazing

DATE: May 29, 1980

The enclosed comments on the above-referenced proposal have just been received from the following:

Colorado Historical Society

Please consider this trsnsmittal as an official addition to the comments which I sent to you earlier. We regret this late transmittal, and hope that these comments can still be given consideration.

Thank you for your attention.

SE/MK/vt
Enclosure

cc: Office of the Governor
Department of Natural Resources

520 State Centennial Building, 1313 Sherman Street, Denver, Colorado 80203 (303) 892-2351

10

4

COLORADO HISTORICAL SOCIETY

The Colorado Heritage Center 1300 Broadway Denver, Colorado 80203

May 21, 1980

Mr. Stephen O. Ellis
Principal Planner
A-95 Clearinghouse
520 State Centennial Building
1313 Sherman Street
Denver, CO 80203

MAY 2 8 1980
DIV. OF PLANNING

Dear Mr. Ellis:

This office has received and reviewed the Draft Environmental Impact Statement for the Gunnison Basin Livestock Grazing, #80-126.

Cultural resources have been dealt with in a Programmatic Memorandum of Agreement between the Bureau of Land Management, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers, therefore, no further comment is necessary.

If this office can be of further assistance, please call the Compliance Section at 839-3391.

Sincerely,

for Arthur C. Townsend
State Historic Preservation Officer

ACT(WJG):ng

5

GG

G. Gehrke - The Fly & Gun Bench

DRAWER 1204, SALIDA COLO. 81201
303 - 539-3990

RECEIVED
JUN - '80
BLM Montrose Office

HENRI BISSON ; 6 JUNE 80
EIS PROJECT MANAGER
P.O. BOX 1269
MONTROSE, COLORADO 81401

DEAR HENRI: (MR BISSON)

ON JUNE THE 4TH, THE COMMISSIONERS FOR THE COLORADO DIVISION OF WILOLIFE, CONFIRMED A REDUCTION OF 2,375 ELK TO BE HARVESTED OUT OF AREAS 53,54,55,551, & 63.

800 ELK ARE TO BE HARVESTED OUT OF AREAS 66 & 67 FOR A TOTAL OF 3,175 BIG GAME ANIMALS....ELK ALONE.

AREAS 66 & 67 WILL BASICALLY STAY AT ITS PRESENT LEVEL BECAUSE OF THE LOW NUMBER OF ELK IN THIS AREA COMPARED TO CATTLE.

HOWEVER, IN AREAS 53,54,55,551, & 63, THE POST-SEASON (1979) NUMBERS ARE TO BE REDUCED FROM AN ESTIMATED 8,220 ANIMALS TO A 1983 POST-SEASON OBJECTIVE OF ONLY 7,500 ANIMALS.

IT MUST BE POINTED OUT THAT A GOOD AND ACCURATE ELK COUNT WAS NOT POSSIBLE IN AREAS 55 & 551 FOR A FEW YEARS AND THAT THE ESTIMATES OF THE ANIMALS IN THIS OVERGRAZED AREA ARE A "BIT HIGH" IN MY OPINION. ESPECIALLY AFTER 5-1 RIDING THIS RANGES FOR THE LAST TWO YEARS. ITS ALSO AN AREA USED BY A MIGRATORY HERD THAT DOES NOT SUMMER OR SPRING GRAZE IN THIS AREA. THE RESIDENT HERD IS BY LARGE, A VERY SMALL ONE.

THE FACT OF THE MATTER IS, THE REDUCTION OF 720 WAPITI REPRESENTS A PRESENT REDUCTION, (PRIOR TO THE FINALIZATION OF THE GRAZING ENVIORMENTAL IMPACT STATEMENT) OF A LARGE AMOUNT OF WEALTH TO THE CITIZENS OF THE GUNNISON BASIN AND THE STATE OF COLORADO.

IT'S THE PURPOSE OF THIS LETTER TO POINT OUT THAT THE STATE OF COLORADO IS CO OPERATING WITH THE BLM WELL IN ADVANCE OF THE FINAL DRAFT. NOT ONLY TO SHOW ITS COOPERATION WITH THIS BUREAU, BUT TO SHOW THAT IT TOO CARES ABOUT ITS RANGELANDS.

THE PEOPLE OF THIS STATE, AND ITS SPORTSMEN, EVIDENTLY WISH TO SET AN EXAMPLE TO BE FOLLOWED, (AND TO BE RESPECTED) BY THE COLORADO CATTLEMEN'S ASSOCIATION. ITS ALSO MY INTEND TO HAVE THIS BOLD ACTION TO BE DULY NOTED AND KEPT IN MIND BY THE FEDERAL BUREAU OF OUR LAND MANAGERS.

I ENCLOSE THE ELK OBJECTIVES, A COPY OBTAINED BY MYSELF FOR YOUR USE AND FILES, AS I KNOW THAT NOONE ELSE HAS SEEN FIT TO INFORM THE BLM UP TO THIS TIME.

I ALSO WISH TO POINT OUT THAT MR JIM HUSTON CAN BE GIVEN CREDIT FOR THE FINAL RECOMMENDATIONS OF THESE REDUCTIONS WITH AN EYE ON THE FUTURE, WHICH IS MY HOPE AND I'M SURE..."HIS" TO SEE THAT THESE ELK HERDS ARE RETURNED TO THE PEOPLE OF THIS STATE IN THE FUTURE. MAY NOONE EVER FORGET THIS WISH.

5-1 The wildlife population numbers used in the EIS were obtained from the Colorado Division of Wildlife, and constitute the best professional estimates available.

G. Gehrke - The Fly & Gun Bench
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MR HENRI BISSON : BLM 6 JUNE 80 PAGE 2

NOTHING IN NATURE LOVES TO CHOMP ON SAGE AS WELL AS TWO ANIMALS DO. ONE IS THE MULE DEER....THE OTHER IS THE MORE EFFICIENT ANTELOPE. (ON SAGE)

IT WOULD BE WELL TO CONSIDER USING THESE ANIMALS IN THE HEAVIER SAGE AREAS TO ELIMINATE IT (OR HELP TO) AND WHEN THE GRASS COMES BACK, USE CATTLE TO GRAZE LIGHTLY IN THESE AREAS UNTIL LARGER NUMBERS OF ANTELOPE HERDS ARE NEEDED AND LET THE HERDS INCREASE IN PROPER CYCLES. THIS MEANS BOOM YEARS AND MUCH LOWER YEARS....DEPENDING ON THE LOWER SAGE RANGE CONDITIONS.

ANOTHER FACTOR IS, NOTHING IN NATURE CONVERTS GRASS TO PROTEIN AS READILY AS THE MULE DEER CAN. NO COW CAN COMPETE WITH THE MULE DEER IN THESE RESPECTS. THEY ALSO ARE VERY GOOD AT USING SAGE....WHEN TALL....FOR WINTER FORAGE.

THE OTHER FACTOR IS THE LOWER 5 TO 10% WINTER RANGE THAT IS SO VITAL TO OUR BIG GAME HERDS ARE STOLEN BY THE CATTLE.

WHEN WINTER COMES....LARGE AMOUNTS OF PUBLIC WASTE TAKES PLACE IN STARVATION. NOT THAT STARVATION IS NECESSARY, BUT THIS LOWER RANGE IS TAKEN "BY HERITAGE" BY THE CATTLEMEN.

"HERITAGE" IS NOT AN EXCUSE TO STEAL LEGALLY UNDER THE LAW.

ANOTHER TERM THAT MUST BE CLEARED UP IS THE CONCEPT THAT RANCHERS HAVE "GRAZING RIGHTS."

THESE ARE NOT "RIGHTS" BUT RATHER "GRAZING PERMITS". THEY ARE A GIFT OF "THE PEOPLE" WHO RECIEVE NO BENEFITS FROM THIS PRACTICE.

THE WORD "HERITAGE" IN THE DICTIONARY MENTIONS NO WORD ASSOCIATED WITH IT IN THE DIRECT USAGE OF "RIGHTS".

5-2 TERMS SUCH AS THIS SHOULD BE STATED IN A NEW WRITE UP TO CLEARIFY THE FACT THAT RANCHERS MAY HAVE A HERITAGE, BUT THEY HAVE "PERMITS," NOT "GRAZING RIGHTS."

FOR EXAMPLE, WHERE IS THE "RIGHTS" OF THE GRAIN FARMERS IN OHIO, OR ILLINOIS, ETC, WHO WOULD LIKE TO COMPETE WITH THE WESTERN CATTLE GROWER, OR SHEEP GROWER AND DOESN'T HAVE GRAZING PERMITS, OR THE RIGHT TO BID ON THEM...FOR REASONABLE USE? NATURALLY, ITS ECONOMICALLY IMPOSSIBLE FOR HIM TO DO SO.

THE FACT THAT FIVE SHEEP ACCOMPLISH THE SAME FEATS OF OVER GRAZING AS CATTLE DO BUT CAUSE MORE PROBLEMS ON OUR WILDLIFE THAN CATTLE, CANNOT GO UNNOTICED. THEY ARE NOT ONLY HARDER TO MANAGE AND PROTECT, BUT THEY BRING IN THE GREATER PROBLEMS OF POISONS AND THE PERPETUATION OF THE KILLING PROGRAMS WHICH KEEP IN BUSINESS A VERY UNPLESENT AGENCY.

I.E. THE COYOTE....WHICH IS WORTH MUCH MORE TO A HUNTING AND RECREATIONAL ECONOMY THAN A CALF! HARD TO BELIEVE?

BUT, ITS TRUE.

ONE COYOTE PELT BRINGS IN ENOUGH MONEY TO REACH A PLATEAU OF ALMOST $200 IN SOME YEARS AND THIS IS NOT JUST THE MONEY THE TRAPPER OR HUNTER GETS EITHER. A COYOTE COAT SELLS FOR $4000.00 DOLLARS. (AFTER MANUFACTURE IN NEW YORK WHICH RECIEVE MANY HIDES FROM COLORADO.

5-2 The terms "grazing permit" and "grazing privileges" are used in the EIS.

G. Gehrke - The Fly & Gun Bench
DRAWER 1204, SALIDA COLO. 81201
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MR HENRI BISSON : BLM 6 JUNE 80 PAGE 3

HENRI, I WOULD ALSO LIKE TO HAVE IT PUT INTO YOUR RECORDS FOR THE FINAL DRAFT, THAT TO GIVE UP THE VERY VALUABLE NUMBERS OF ANIMALS THAT WE ARE SPEAKING OF, IS A HARD THING. BUT, "THE LAND" COMES FIRST. THIS POINT MUST BE HELD ONTO WHEN DEALING WITH THE UNREASONABLE GREED OF THE CATTLEMEN.

THAT, THE THREAT OF "LAW SUITS" CANNOT, AND SHOULD NOT BE REASONS FOR LACK OF COURAGE. I WANT THEM AND THE PEOPLE TO KNOW AND UNDERSTAND THIS.

NOW, I WISH TO POINT OUT SOME VERY INTERESTING FACTS AND FIGURES....BUT FIRST THIS.

OUR VOLUNTARY REDUCTIONS IN THE MENTIONED AREAS IS A LITTLE OVER 9%...BUT IS ACTUALLY RIGHT ON THE 11% REQUESTED BECAUSE OF AREAS 55 & 551 OVERSTATED FIGURES.

TO PROVE THIS, ITS SUGGESTED THAT THE BLM TAKES ITS OWN COUNT IN THESE TWO AREAS IN THE LATE SPRING AND SUMMER OF NEXT YEAR TO PROVE THAT THE 11% REDUCTIONS HAS BEEN ACHIEVED.

I'M SURE, THAT IF YOUR BUREAU FINDS THESE TWO AREAS ARE AS STATED, FINE.

IF NOT, IT SHOULD BE CONSIDERED THAT OUR BIG GAME HERD REDUCTIONS ARE WELL IN ADVANCE OF THE CATTLEMENS AND THAT THE LOWER NUMBERS REDUCTED "PRIOR" TO YOUR IMPLIMENTATION SHOULD BE CONSIDERED IN THE OVERALL AVERAGE.

IF NOT, AND THE BLM KNOWS THAT THE OTHER 2% IS ABSOLUTELY NEEDED, WE ARE SURE YOU CAN EXPECT THE COOPERATION OF MANY OF US.

NOW FOR SOME RESEARCHED FACTS WITH THE PROPER REFERENCE MATERIAL.

FROM "CHAPTER 17 DAMAGE CAUSED BY BIG GAME" (RESULTING FROM THE PASSAGE OF HB-1235 AS PUSHED AND SPONSORED BY THE COLORADO CATTLEMENS ASSOCIATION) SHOWS, AND WAS AGREED WITH/BY THE LIVESTOCK AND ORCHARD GROWERS OF THIS STATE THAT ONE COW CONSUMES WHAT WOULD SUPPORT 3.1 ELK (WAPITI), 6.3 DEER, OR 14.8 ANTELOPE.

THEREFORE HENRI, ACCORDING TO THE FAIRNESS OF THE SITUATION, FOR EACH EQUAL REDUCTION TO BE CORRECT....I.E. (TIT FOR TAT) IF 11% IN ELK REDUCTIONS IS TO BE EQUAL TO THE CATTLE REDUCTIONS, THE REDUCTIONS IN CATTLE SHOULD NOT BE 26% BUT ANOTHER 13% FOR A TOTAL OF 39%....BECAUSE ONE COW EATS THREE TIMES MORE THAN ONE ELK AND DOES MORE DAMAGE NOT ONLY EVIORMENTALLY, BUT ECONOMICALLY IN THE BARGAIN. 5-3

THE PROPER RATIO SHOULD BE 3:1, AND MORE ACCURATELY.... 3.1:1

ANOTHER FACT IS THAT FOR EACH COW TO ELIMINATE THE HABITAT FOR 14.8 ANTELOPE (AND SOME BELIEVE ITS MUCH MORE) SHOULD BE LOOKED AT CLOSELY AND FOR THIS REASON.

5-3 The vegetation allocations for livestock and big game were developed by an interdisciplinary team, through the BLM planning system, using the methodology and literature outlined in Appendix RM-2 (page 195).

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MR HENRI BISSON : BLM 6 JUNE 80 PAGE 4

ANYHOW, "THE COYOTE" IS NOT THE CHEAP AND LOWLY ANIMAL HE IS MADE OUT TO BE.

GETTING BACK ON TRACK MR BISSON, WHAT ONE COW EATS, ELIMINATES 3.1 ELK OR 6.3 MULE DEER.

ONE ELK, (FROM MY PERVIOUS REFERANCES I'VE SENT YOU) IS WORTH "MONEY WISE" $10,000.00 IN DIRECT SOCIAL ECONOMICAL BENEFITS TO THE PEOPLE OF THIS STATE.

THEREFORE: ONE COW GRAZES FOR $1.86 CENTS PER MONTH, AND IF IT IS ALLOWED TO GRAZE FOR TWO MONTHS, IT ELIMINATES THE RANGE THAT WOULD SUPPORT 6.2 ELK....OR $60,000.00 DOLLARS WORTH OF ECONOMICAL BENEFITS.

THIS FIGURES ARE NOT UPDATED TIGHTLY OTHERWISE THEY WOULD BE MUCH HIGHER. (PLEASE NOTE THIS POINT, AS THESE ARE VERY REASONABLE COST FACTORS)

EVERY RANCHER COMPLAINS THAT THEY MAKE ONLY 5% ON "THEIR" INVESTMENT.

THEREFORE; SUPPOSING THAT A 1,000 POUND COW IS ALLOWED TO GRAZE FOR TWO MONTHS...FOR $3.72 CENTS, WHICH INCLUDES ALSO A CALF. (OR IN MANY/SOME CASES) A PRE-BOUGHT CALF, THAN LATER ANOTHER CALF IS BORN WHICH MAKES THREE OF THEM....THIS COW, IF SOLD WILL BRING LETS SAY 1050.00 TO MAKE $50 DOLLARS.

WE, THEREFORE HAVE NOT GIVEN AWAY OUR GRASS AT A STUPID PRICE...,BUT IT COST THE PUBLIC $60,000.00 DOLLARS IN THE DEAL TO MAKE A RANCHER $50 DOLLARS!

WELL...IT DOESN'T STOP HERE, BECAUSE ITS MUCH, MUCH MORE.

FOR INSTANCE, THIS RANCER IS GOING TO WRITE OFF ANY TAXIABLE INCOME THROUGH HIS RANCH. WHAT EVERYONE ALSO DOESN'T REALIZE THAT WE ARE TRYING TO SUPPORT THIS STATE AND NATION ON ONE INDIVIDUAL (IN THIS EXAMPLE) AT THE SACRIFICE (A PROPER WORD IN THIS CASE) OF MANY PEOPLE PAYING TAXES.

FOR INSTANCE, THE MONEY THAT 150 RECREATIONAL ELK HUNTING DAYS THESE 6 ELK WOULD PROVIDE IS NEW MONEY THE FIRST TIME IN, ITS TAXED A MINIMUM OF A SECOND TIME BEFORE IT LEAVES THIS STATE'S OR A LOCAL ECONOMY.

THEREFORE; IN ORDER TO PROVIDE THIS RANCHER WITH $50 DOLLARS OF GENERALLY "NON-TAXIABLE" INCOME....ACTUALLY COST THE PEOPLE OF THE STATE $120,000.00 DOLLARS IN DIRECT INCOME TO BUSINESSMEN AND WOMEN....BUT AT 6%....$7,200.00 IN TAX REVENUES!!!

THE SECRET TO STRONG GOVERNMENT AND A STRONGER NATION, IS TO GET AS MANY PEOPLE TO PAY TAXES AS POSSIBLE ON THE SAME COMMODITY. NOTHING DOES THIS BETTER THAN WILDLIFE.

UNDER THE CIRCUMSTANCES, THIS IS NOT GOOD BUSINESS. ITS ALSO THE "WAY" THE MULTIPLE USE CONCEPT IS USED THAT ALLOWS THIS, NOT THE INTENT IN THE PROPER CONCEPT IT SHOULD BE APPLIED. TO BENEFIT THE MAJORITY. POSSIBLY, THIS IS ABOUT TO CHANGE UNDER YOUR NEW MANDATES FROM CONGRESS. TIME WILL TELL.

the "Trout Snatchers"

G. Gehrke - The Fly & Gun Bench
DRAWER 1204, SALIDA COLO. 81201
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MR HENRI BISSON : BLM 6 JUNE 80 PAGE 5

WE CANNOT HOLD ANY RESPECT FOR ANY MAN THAT GRAZES ON PUBLIC LANDS FOR $1.86 A MONTH....AND CONDONES IT.

TO ALLOW SUCH PEOPLE THE TACTICS TO INSTILL FEAR UNDER THE THREAT OF "LAW SUITS" CANNOT BE TOLERATED, AND THEIR CHALLENGES MET WITH VIGOR AND WITH PUBLIC TENACITY TO RIGHT A WRONG, LONG OVERDUE.

BECAUSE OF THE EFFORTS OF MR JIM HUSTON, CONSERVATION OFFICER, DIVISION OF WILDLIFE....AND AS OUR REPRESENTATIVE IN HIS RECOMMENDATIONS TO YOUR BUREAU WHICH HAVE BEEN HONORED, CANNOT....AND SHOULD NOT, GO UNNOTICED.

THAT YOUR OFFICES CAN POINT WITH PRIDE TO THE AGENCIES OF THIS STATE THAT ARE TRYING TO COOPERATE, SHOULD BE USED AS AN EXAMPLE FOR THE CATTLE AND SHEEPMEN TO FOLLOW.

THAT TO ALLOW A MINORITY (125 RANCH FAMILIES) TO DICTATE PUBLIC POLICY TO 8,000 GUNNISON COUNTY CITIZENS CANNOT BE ALLOWED.

WE CITIZENS HAVE GIVEN UP A $7 MILLION DOLLAR BIG GAME INVENTORY, ($14 MILLION TAXIABLE) IN ADVANCE,TO IMPROVE OUR RANGELANDS IN THE GUNNISON BASIN. IN ADDITION, THE CITIZENS OF THE STATE OF COLORADO ARE GIVING UP THESE AMOUNTS EACH YEAR THEY STAY IN AFFECT.

THE UNITED STATES OF AMERICA ARE IN THE MOST REASONABLE OF TERMS, ARE GIVING UP A TOTAL OF $28 MILLION DIRECTLY AND TAXABLE.

THESE ARE THE FIGURES THAT THIS NATION HAS NOT BEEN AWARE OF. THESE ARE THE TRUE FIGURES THAT HAVE BEEN HIDDEN INBETWEEN THE RESEARCH REPORTS FOR SO MANY YEARS. AND THESE ARE THE FIGURES THAT PROVIDE THE TAXES THAT RELIEVE THE BURDENS OF TAXES FROM SO MANY PEOPLE...OR COULD.

TO CONTINUE TO ASK THAT SO MANY SUBSIDIZE SO FEW TO BECOME COMFORTABLE....IS UNREASONABLE.

TO ALLOW RANCERS TO GUIDE AS BIG GAME GUIDES IS MORE THAN REASONABLE...,BECAUSE, WHETHER THEY REALIZE IT OR NOT, WILDLIFE IS A BETTER MOUSETRAP TO MAKE A LIVING OFF OF.

I KNOW OF ONE "EX-RANCHER" THAT GUIDES NOW AND THIS LAST YEAR, HE GROSSED $50,000.00 GUIDING HUNTERS. HE WORKED FOR ONE MONTH, AND "MESSES AROUND" FOR THE REMAINDER OF THE YEAR.

THE STATE OF COLORADO "PROVIDES HIM" WITH A SPECIAL GUIDING AREA PERMIT, ASSIGNED ONLY TO HIM IN CONJUCTION WITH THE COLORADO GUIDE ASSOCIATION.

ITS A SMART WAY TO DO BUSINESS.

FEDERAL ASSISTANCE TO OPEN "THE DOORS" TO THESE RECREATIONAL DOLLARS (BIG DOLLARS) SHOULD BE CONSIDERED TO THOSE RANCHERS INTERESTED AND WHO ARE MARGINAL BUSINESSMEN IN THE FIRST PLACE, BUT WHO MORE THAN LIKELY WOULD BE GREATER SUCCESSES IN THE PROPER AND WISER USE OF OUR WILDLIFE RESOURCES....IN EXCHANGE FOR GIVING UP THE CATTLE.

The "MARRYAT"
World's Finest Reel

the "Trout Snatchers"

G. Gehrke - The Fly & Gun Bench

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MR HENRI BISSON : BLM 6 JUNE 80 PAGE 6

HENRI? AS HARRY TRUMAN SAID..."THE BUCK STOPS HERE," SHOULD BE THE HARDLINE I ENCOURAGE THE BLM TO TAKE CONSIDERING THE LAWSUITS, OUR LAND, OUR GRASSES IN RELATION TO THE CATTLEMEN'S ASSOCIATION.

IF IT ISN'T DONE NOW.....IT WILL NEVER BE DONE.

UNDER THE CIRCUMSTANCES, I WAS NOT PLEASED WITH THE ARTICLE IN THE GUNNISON COUNTRY TIMES ABOUT THE "INTENT" TO COMPROMISE BECAUSE OF THE THREATENED SUITS BY THE CATTLEMEN.

WE MUST REMEMBER, THAT THEY CONTINUE TO DO THIS TIME AFTER TIME TO BADGER AND BULLY THEIR WAYS ONTO YOUR OFFICES. ITS NOW TIME TO TAKE A FIRM STAND.

ITS POSSIBLE TO ASK THE FEDERAL LAW AGENCIES TO COUNTER WITH AN INJUNCTION AGAINS'T ALL GRAZINGS BECAUSE OF THE DEPLORIABLE CONDITIONS OF THE RANGE. IT WOULD BE THEIR RESPONSIBILITY THAN TO PROVE THEY DON'T EXIST. BUT I KNOW THIS IS NOT POSSIBLE.

BUT AS THE REPRESENTATIVE, YOU ALREADY HAVE A MANDATE TO TAKE INVENTORY AND STOCK OF OUR RANGELANDS BY CONGRESS. THAT DETERMINATION HAS BEEN "FAIRLY WELL MADE."

I DON'T THINK YOU SHOULD MAKE THE MISTAKE OF "UNDERESTIMATING" THE SUPPORT YOU HAVE FROM THE PEOPLE OF THIS STATE. ITS MASSIVE.

AS YOU REMEMBER, MY MAIN POINT DURING THE HEARINGS WAS THAT THE BLM DID NOT TAKE INTO CONSIDERATION THE "SOCIAL-ECONOMICAL" IMPACT OF DECREASED VALUES OF OUR GAME HERDS AND RECREATIONAL DOLLAR LOSSES IN THE GRAZING E.I.S. 5-4

UNLESS THE VALUES OF OUTDOOR RECREATION ARE FULLY STATED OR RECOGNIZED CAN THAT REPORT BE OF PROPER VALUE.

UNLESS "WILDLIFE" AND THE "NON-CONSUMPTIVE" USE FACTORS OF OUTDOOR RECREATION ARE RECOGNIZED CAN THAT REPORT BE OF ANY VALUE IN FIGHTING THE LIVESTOCK LOBBIEST.

I ALSO OBJECT TO THE FRONT PICTURE OF TWO COWS LOOKING NOT ONLY STUPID, BUT AS IF THEY OWNED THE RANGE AND THE REPORT. (WHICH THEY DO). THIS COULD BE BETTER P.R. BECAUSE MORE PEOPLE RELATE TO THE OUTDOORS WITH WILDLIFE AND OUR LANDS, AND YOUR OFFICE WITH A SIMPLE RABBIT THAN A COW.

THE WORD, "LIVESTOCK" SHOULD BE DROPPED FROM THE TITLE AND SIMPLY READ..."GRAZING & OUTDOOR ENVIRONMENTAL IMPACT STATEMENT".

ITS A NON-PREJUDICED TITLE AND IS "BETTER BALANCED" FOR FAIRNESS TO ALL SIDES.

UNDER THE PRESENT TITLE, IT DOESN'T "PROPERLY REPRESENT" THE PROPER INTENT OF THE MULTIPLE USE CONCEPT. IT INFERS A "BIASED CONCEPT" AND THIS IS WRONG. I HOPE YOU AGREE TO THIS FAIR REQUEST HENRI.

BECAUSE I ADMIT TO THE HABIT OF TRYING TO REPRESENT THE BETTER INTEREST OF THE "COMMON GOOD" IN ALL MY TALKS AND WRITINGS, I ADMIT TO THE FACT THAT INITIALLY, I DON'T LIKE THE PUBLIC LOSS OF VAST FUNDS TO PROFITEER "A FEW."

I WILL VIOLENTLY OBJECT IF THE MINORITY ISN'T HELD RESPONSIBLE FOR THEIR "FAIR SHARE" OF DECREASED AUM'S. THIS IS ONLY RIGHT.

5-4 Under the heading of "Economics" for the environmental consequences of each alternative, such wildlife economic impacts are addressed. The recreation aspects of these impacts are discussed under "Recreation".

G. Gehrke - The Fly & Gun Bench

DRAWER 1204, SALIDA COLO. 81201
303 - 539-3990

MR HENRI BISSON : BLM 6 JUNE 80 PAGE 7

A RECENT WILDLIFE STUDY BY YALE UNIVERSITY SHOWS THAT 70 TO 90% OF THE AMERICAN PEOPLE SUPPORT WHOLE-HEARTENLY ISSUES THAT BENEFITS ITS LANDS AND WILDLIFE THAN THOSE THAT DAMAGE IT.

THIS PUTS YOUR OFFICES ON SOLIDER GROUND THAN WHAT ONE WOULD IMAGINE.

YOU CAN EXPECT MY SUPPORT IN ANY MANNER IN WHICH I CAN BE OF HELP.

MY RECORDS AND OFFICE ARE OPEN TO YOU ANYTIME YOU WISH THEM.

WE ARE PRESENTLY COMPILING AN EXTENSIVE AND PROFESSIONAL ANIMAL VALUES RESEARCH REPORT AND I APOLOGISE FOR THE PIECE MEAL WAY IN WHICH MY POINTS ARE PRESENTED,...BUT THEIR ACCURACY IS GREATER THAN WHAT ANYONE EVER CAN IMAGINE. I AM PREPARED TO PROVE ANY FACT, FIGURE, OR QUESTION PRESENTED ME.

I CAN DO IT WITH EASE.

I WOULD ALSO APPRECIATE ANY INFORMATION ON "SERIOUS MEETINGS" AND THEIR "INTENT" IN ENOUGH ADVANCED NOTICE SO THAT I CAN COME BETTER PREPARED THAN LAST TIME MR BISSON.

IF YOU CAN DO THIS, BY PUTTING ME ON A NOTICE OR MAILING LIST, I WOULD APPRECIATE IT AND WOULD CONSIDER ANY REQUESTS IN COMMENTS IN THE "DIRECTION" YOU WOULD LIKE TO SEE THINGS GO.

IF NOT, YOU WILL, AND CAN EXPECT, THE BEST THAT IS IN ME....AS LONG AS IT ALWAYS BENEFITS THE MAJORITY....NOT THE MINORITY.

IN THIS, LAYS THE STRENGTH OF ALL OF OUR TOMORROWS.

HOPING THIS LETTER IS OF SOME VALUE TO YOUR OFFICES, I REMAIN,

GG/GG

SINCERELY YOURS,

GEORGE GEHRKE
PRESIDENT

TWO QUOTES FOR YOUR MIND AND FUNNY BONE:

"THE WONDER OF A SINGLE SNOWFLAKE OUTWEIGHS THE WISDOM OF A MILLION METEOROLOGISTS." - FRANCIS BACON

"CATTLEMEN HAVE BEEN TAKING GREAT STRIDES FORWARD. NOW THEY ARE ONLY FIFTY YEARS BEHIND THE COMIC BOOKS." - GEORGE GEHRKE

United States
Environmental Protection
Agency

Region 8
Suite 103
1860 Lincoln St.
Denver, CO. 80295

Colorado, Montana,
North Dakota,
South Dakota,
Utah, Wyoming

6

EPA

JUN 9 1980

Ref: 8W-EE

Henri Bisson
Bureau of Land Management
Gunnison Basin EIS Project Manager
P.O. Box 1269
Montrose, Colorado 81401

Dear Mr. Bisson:

The Region VIII Office of the Environmental Protection Agency has reviewed the draft environmental impact statement for Gunnison Basin Livestock Grazing. Generally EPA believes that this EIS is a well written document and adequately covers the principle environmental issues of concern. EPA supports the effort by the BLM to improve rangeland conditions for livestock grazing and other uses. The following are a number of issues we would like to offer for your consideration in the preparation of the final EIS:

1) Herbicide Applications

6-1 On page 16 of the EIS, methods of application of 2,4-D for brush (sage) controls are discussed. The EIS states that a minimum unsprayed buffer zone of 75 feet will be observed along all drainages containing live streams and/or areas of open water in or adjacent to spraying projects. We seriously doubt that aerial drift can be controlled this accurately in many situations. The buffer zone for protection of surface waters needs to be expanded. Applications should strive to leave a ¼ mile unsprayed zone if practical; at a minimum, the buffer zone should be no less than 100 feet.

The EPA Office of Pesticides Programs, Benefits, and Field Studies Division (BFSD) is currently organizing a multi-state range management research project to analyze benefits and impacts of herbicide management. Colorado is one of six states that will be involved in the project. The BFSD study could be a potentially valuable information resource for future BLM rangeland management projects. We invite you to contact Mr. Charles Reese, BFSD Project Manager, (FTS 472-9327) or Region VIII contact Dallas Miller (FTS 327-3926) for further information regarding the possible application of this study to the Gunnison Basin situation.

6-2 The EIS also briefly mentions the use of fire retardants in conjunction with fire management on certain rangeland areas. What types of retardants are contemplated and what kinds of precautions will be observed?

2) Erosion Problems From Rangeland Management (Short-term)

6-3 On page 97 of the draft EIS, an estimate is made that a short-term increase in erosion rates to approximately one million tons per year will occur. Since approximately 100,000 acres of land are slated for treatment, this results in an increase to ten tons/acre/year. Is this the amount of

6-1 See text change indicated on errata sheet.

6-2 If retardants were used, they would be of the fugitive type, and would break down quickly, with a fertilizing effect on the vegetation. Any retardant used would be of a type approved by EPA, and would be applied in accordance with BLM guidelines to insure protection of the environment.

6-3 The 1,084,601 tons/year figure would be total erosion over the entire EIS area (see Table 2-9, page 38), no significant impacts are predicted to the aquatic regime (see pages 104-106). Methodology used to determine erosion is shown in appendix W-1 (page 313).

increase or the total result over some present erosion rate (the 3.1 tons/acre/year mentioned above on page 97)? This increase could be significant depending on the duration and location. The final EIS should explain how this figure was generated. An attempt should also be made to identify which stream segments in the Gunnison Basin are the most likely to be affected and whether the aquatic regime will be significantly affected. If there is potential for stream degradation, the final EIS should discuss whether mitigation measures such as sediment traps can and will be used in conjunction with the rangeland management techniques.

3) Wilderness Values

The EIS mentions that some 100,000 acres within the Gunnison Basin have wilderness potential. On page 113, the EIS briefly indicates that some wilderness candidate areas could be impacted by the rangeland management program. The final EIS should more fully delineate how much wilderness study area is slated for vegetation management. Given the three basic rangeland management techniques -- chemical applications, fire management, and physical manipulations of vegetation -- the EIS should identify which techniques would be allowed within the wilderness study areas. We would think that with the possible exception of some fire management techniques, chemical or mechanical management techniques could significantly alter wilderness characteristics. In any case, the final EIS should expand the policy to be applied from the Interim Management Policy and Guidelines for Lands Under Wilderness Review in this situation more thoroughly.

4) Fire Management Effects on Air Quality

The draft EIS did not consider the impact of fire management techniques on air quality. While the BLM may have a valid rationale for deciding that such techniques will not have a significant effect, the final EIS should at least briefly explain this rationale. Factors such as the timing, duration, and location of the use of fire as a management tool would seem to have an important bearing on how much impact can be expected.

5) Financing and Timing of Rangeland Management Techniques

The EIS does not attempt to deal with the real-world timing of the proposed techniques recommended for this EIS. Given the uncertainties of funding from year-to-year and the staggered approach to rangeland management, we could expect that many of the quantitative impacts identified in the EIS (e.g., erosion rates) would be spread out over time. In many cases the actual impacts may be quite insignificant when viewed over the time horizon. The final EIS should try to place the cumulative impacts identified in this perspective.

6-4 As paraphrased from page 113, approximately 3,858 acres of rangeland treatments are proposed on areas that were identified as having wilderness potential.

6-5 As noted on page 113, any proposed rangeland improvements within Wilderness Study Areas would be evaluated on a case-by-case basis. Those improvements that could impair the area's wilderness suitability would not be allowed. If Congress did not designate Wilderness Study Areas as wilderness, multiple use activities such as treatments could be implemented.

6-6 Without specific information with which to make predictions on possible emissions from prescribed burns, the possibility exists that federal and state air quality standards could be violated (for a short period of time over a small area). However, as noted on page 16 (Draft), no area would be burned until a prescription and a site specific environmental assessment is written, incorporating the terms of the "Memorandum of Intent" between the BLM and the Colorado Air Pollution Control Division. Compliance with these restrictions should minimize impacts to the area's air quality.

6-7 As noted in the Impact Analysis Assumptions (page 83), the impacts predicted were based on a full funding and implementation scenario in order to provide a common base for impact analysis. As such, the impacts would be "worst case." Should the rate of funding be lowered or the time of implementation be lengthened, the impact levels would be lessened also. However, it is not possible to quantify such occurrences at this point.

Based on EPA's system for rating EIS's under its review, we have categorized this EIS as LO-2. This means that we have no objections to the project as proposed; we do think that the final EIS should contain further information as suggested in the above comments.

Please contact Mike Gansecki of my staff (FTS 327-4831) for further assistance from EPA. We hope that these comments will prove useful to you in the preparation of the final EIS.

Sincerely yours,

Roger J. Williams
Regional Administrator

7

Ochs Brothers
Box 702
Gunnison, CO 81230
June 11, 1980

RECEIVED
JUN 13 '80
BLM, Montrose Dist.

Mr. Henri Bisson
Bureau of Land Management
Gunnison Basin EIS Project Manager
P.O. Box 1269
Montrose, CO 81401

Dear Sir:

Included are my written comments on the draft enviromental impact statement on proposed livestock grazing management in the Gunnison Basin and American Flats/Silverton planning units of the BLM Montrose District in southwestern Colorado.

These comments are in addition to, and should be merged with the verbal comments which I made on the subject at the hearing at 7:00 p.m. at Webster Hall in Gunnison on May 21, 1980.

Table 3-1 on page 42 indicates that data contained therein is approximate. Annual precipitation figures and elevation figures show wide variations, and various vegetative types do appear within the same elevation and precipitation ranges. This table points out the incorrectness of drawing conclusions as to specific vegetative varieties that should be present on specific grazing allotments. This type of information, while interesting and book-filling, can in no way substitute for accurate information, assembled over a long length of time by on-site research on each allotment; unfortunately on the overwhelming majority, this type of accurate information is not available and conclusions reached in the draft copy are not valid. 7-1

On page 47 the 1978 range survey is described as "extensive". This is not true in the case of most of the individual allotments. For instance in the case of West Antelope Creek, No. 6208, the range survey work and range sites selected were not extensive enough to accurately measure the range; the sites tended to be chosen which were close to roads, waterholes, and heavy use and salting areas of 20 to 40 years ago when all of the ranchers ran together and the range was not broken into allotments. Proper consideration was not given to the entire range, and the higher and more productive areas of the allotment were not studied at all, and their contribution to carrying capacity was not adequately considered. Consequently, on this allotment the BLM recommended acut in grazing 7-2

7-1 As discussed in detail in Appendix RM-2 (page 195) all available rangeland data has been used including, (1) ecological condition and apparent trend data gathered during the summer of 1978, (2) recomputed ocular reconnaissance, (3) range survey (1949-60) and additional range survey data gathered in 1978 on areas not previously surveyed, (4) actual use 1967-78 (where available), (5) utilization of annual vegetation 1965-78 (where available), (6) established trend index and base line photo points, and (7) allotment inspections by professional range people, wildlife biologists, botanists, soil scientists, hydrologists, and fishery biologists. Also consulted were range users, state and federal agencies, and members of the public.

As discussed in Supervision and Monitoring (#5, page 21), within 3 years following the Rangeland Program Decision Document, adjustments in AUMs to the selected alternative may occur, with the final adjustment in the third year. Along with the above years of rangeland monitoring, additional data are being collected and will be collected up to the time the Program Decision Document is filed. In total, on allotments which had limited data, 6 years of data (including utilization, actual use, condition, and apparent trend) will have been collected. On those allotments where intensive rangeland studies have been employed, up to 18 years of data will have been collected.

Conclusions reached on limited data will be scrutinized on an individual allotment basis. As these additional data become available, adjustments in forage allocations could be done.

7-2 On Allotment 6208, 3,658 acres were inventoried with 15 transects and 24 sample plots. The "range sites" and "range survey" plots as viewed on a tour of this allotment in the spring of 198D were not those described above. The three viewed on the tour were base line photo points and utilization check cages. They are quite different from the quoted "range sites" and "range survey". The locations of the base line photo points were chosen because of the condition of the area to be sampled. The "salting areas" which were adjacent to a live, perennial stream would show a drastic change if present management practices were altered. Changes to the present vegetation in a relatively short time frame (3 years), as above, would depict the outcome of removal of trailing livestock from areas of "heavy use". As explained earlier, the entire public rangeland was sampled, including the lower riparian areas as well as the intermediate slopes and the higher elevations.

numbers of 45%. Dr. Bob Hyde and Dr. Larry Rittenhouse of Colorado State University after walking over large parts of this allotment concluded that the allotment deserved no cut in numbers, and that the apparent trend of the allotment overall was slightly upward. The reliablity of the BLM range studies in 1978 is unsuitable. (And 1979 and 1980 range studies, unless changed to overcome the 1978 weaknesses will likewise be inaccurate.)

The 1978 range study on nine range sites in the EIS is likewise probably invalid since the same procedures were undoubtedly used in scope of study and range site selection. Statistical sampling procedures require great consideration and confidence limits. There is no indication in this draft
7-3 statement that such consideration was given and what deliberation went into it. No confidence limits are set out.

Page 50 points out the need for observing vegetative changes over several seasons to determine accurate vegetation trend. It then points out that the data in the draft statement is based only on one season, 1978, and its conclusions are classified as "apparent" trend. This can only be considered as inaccurate by the previous sentence; so no conclusions should be based on an inaccurate judgement. Further, specific 1978 rainfall and temperatures are not available for each allotment, so reasonable adjustments for 1978 vegetative growth are not possible.

7-4 Table 3-2, Parts A,B,C, contain data whose reliability is subject to question as has already been pointed out. Table 3-3 cannot be considered totally accurate as we often see tall evergreen trees in riparian areas. Certainly, no valid conclusion can be reached which would indicate that these tables should in any way typify the EIS area as a whole or any single allotment within it.

7-5 Map 3 and Map 4, Support Data relating to Distribution of Vegetative Types and General Soil Associations, respectively are so general in nature and exclude so much vital detail, that they are only of very limited usefulness overall, and of no specific applicability as they affect individual allotments.

7-6 Map 5 - Distribution of Elk, etc., and Map 6 - Distribution of Mule Deer, etc., are undated and in no way support any recitation of wildlife numbers as whey are purported to do on Page 62. Numbers of game and areas of habitation are highly changeable each year depending on season hunting kill, weather conditions, and other variables. Numbers listed in this part of the report fail to indicate the year involved or whether the figures are averages over a period of time. There is not sufficient background data to properly assess the reasonableness of these figures and this writer joins many residents of the area in strongly questioning their accuracy.

Page 63 mentions that riparian areas in the West are unique in providing habitat for a great number and variety of wildlife species. If fails to mention that each riparian area is unique within itself. It may have certain attributes of other riparian areas, but in other ways each riparian area is quite different. It is impossible to make meaningful blanket-type statements about the characteristics of all riparian areas. Table 3-5

7-3 See response to comment 7-1.

7-4 Table 3-2 reflects the potential species composition of nine range sites developed and provided the BLM by the Soil Conservation Service. The table does not outline existing vegetation compositions on range sites in the Gunnison Basin. As noted in the response to comment 7-1, BLM does have detailed range site descriptions which were used during the analysis process. Table 3-3 is intended to be a generalized correlation between vegetation types and range sites.

7-5 Maps 3 and 4 were based on mapping work done by the Soil Conservation Service and BLM. The level of detail in the EIS maps is limited by the small scale required to print the maps in the EIS. The maps are intended to represent a broad overview of the total area. Detailed working maps were used throughout the planning process and will be used during the implementation of the selected management alternative.

7-6 The wildlife numbers in the EIS and animal distribution data contained on the maps were based on information supplied by the Colorado Division of Wildlife as well as BLM field studies conducted during 1978. The data are considered the best available at present, however, as additional information becomes available (e.g., AMAX studies) it will be incorported. See text change indicated on errata sheet.

attempts to make some specific observations about the riparian habit condition of the stream habitat in the EIS area, but this table in no way explains the causative factors which attribute to these conditions. For instance, the extent to which wildlife contribute to the condition should be ascertained and presented in detail.

7-7

Table 3-6 shows riparian habitat in relation to allotment numbers in the EIS area. It makes various judgements relating to the condition of the habitat. But, it also fails to present any definitive causative factors contributed by wildlife on the condition. This table, situated in the report in the livestock grazing section, leaves the inference that livestock grazing is responsible for the conditions as judged in the table.

7-8

Table 3-10 relating to operator dependency on BLM grazing indicates the importance that BLM grazing has to continued traditional cattle ranching in the area. Page 78 shows that BLM grazing provides 8.6% of the total vegitative needs of these ranchers. When this is considered in light of Table 3-9, ranch size and income effects, it becomes apparent that any loss of BLM grazing is going to injure many of these operations (who are already losing money) to such an extent it will force them out of business. The BLM range in many cases is the earliest range available to these ranchers. No other early pasture is available. Continued feeding in late spring or earlier summer is not a viable alternative. When ranchers are forced out of business, additional strong pressures are placed on neighboring ranchers. Wildlife is eventually adversely affected when meadows are pastured by the yearling cattle that eventually are run when cow-calf operators are forced out of business. A continuation of this will change and affect the traditional life style in the area, and the social and economic impacts supposedly addressed by the draft EIS will change so greatly that the EIS will become completely invalid as it addresses these impacts.

7-9

7-10 Under assumptions on Page 83, the selection of 8 year and 20 year periods is arbitrary and not justified. This program is inflexible in case objectives are being met. Why not add flexibility if results exceed expectations? Item 4 indicates adjustments will be made if objectives are not being met; no mention is made of change if objectives are being surpassed.

7-11

This writer questions the assumption that BLM will have funding and manpower to develop and implement AMPs and all rangeland improvements will be implemented and maintained. This has never been the case before, and in light of the fiscal and budgetary problems of this nation at the present time, the validity of these assumptions is highly questionable. The likelihood of the Colorado DOW managing wildlife populations to conform with BLM wildlife vegitation allocations is so remote that it bears virtually no credence. Colorado DOW has never previously done this, and a new day of Colorado DOW suddenly doing this is not about to dawn now. Other quantifications of impacts based on BLM estimates and best judgments are not apt to be accurate.

7-12

7-13

7-14

This whole subject of assumptions is blithly tossed out in the report, acknowledged as right and proper, then passed over. Inaccurate assumptions will cause unrealized implementation of proposed actions and render impossible reasonable comparison of the alternatives. Each assumption in the draft EIS should be completely presented, and detailed study of each assumption should be made. The likelihood of each assumption being valid and invalid should each be examined, and the consequences of assumption invalidity should be completely set out. As now written the draft EIS does not properly address the matter of assumption validity and justifi-

7-15

7-7 Tables 3-5 and 3-6 are not intended to describe causitive factors on riparian habitat conditions, only to describe those conditions.

7-8 Table 3-6 was placed on the page following the first reference to it, which is editorial custom. It is referenced and discussed on page 69, in the Aquatic Wildlife section.

7-9 On pages 113-116, the economic and social impacts of the proposed action are discussed, including those on the ranching community. However, other than in general terms, it is not possible to predict how individual ranchers would react to implementation of the proposed action. Recognizing the limited availablity of spring range, some of the proposed vegetation treatments could be used to enhance the availability of spring range in the Gunnison area through conversion of sagebrush dominated sites to early spring forage.

7-10 In order to meet the requirements for EISs under the National Environmental Policy Act of 1970, short term (8 years) and long term (20 years) comparisons are necessary. As noted on page 83, the short term was developed to show those immediate impacts that would occur during implementation of the proposal, the long term was chosen to depict a point in time when the objectives of the proposal are met or not met. Based on the literature cited in the EIS and best professional estimates of the BLM, the 20 year time point should show these effects.

7-11 As noted in item #8 (page 21) and in Assumption #5 (page 83), upward adjustments in grazing use could be made if objectives are exceeded.

7-12 See response to comment 6-7. Additionally, Congress has expressed intent to provide necessary funding and manpower through passage of the Public Rangelands Improvement Act of 1978 (Roncalio Bill). Therefore we must assume funding and manpower will be appropriated.

7-13 The Colorado Division of Wildlife has been actively involved in coordination of wildlife populations throughout the planning and EIS process. The DOW has expressed support for the program (see letter 21). In evidence of this support, "Our Division is committed to help meet BLM range condition goals as documented by our elk harvest management goals outlined for 1980 in units 54 and 55." (Letter 21).

7-14 As stated in the text of the EIS (page 83, as Assumption #10), "Quantifications of impacts presented in this chapter (Environmental Consequences), should be used as estimates and best professional judgement, not as certainties. The best data and literature available were used to predict impacts. The general trends and ratios between impact levels outlined should be accurate, however, exact numbers, as in the case of expected vegetation response, may be slightly different when long-term studies are completed."

cation, and consequently the draft EIS is totally inadequate in this regard. The draft must be changed to relfect this because proper assumptions are so vital to it, and if wrong as some likely are, they render the entire draft EIS invalid and self-defeating.

7-16 The energy requirements on page 83 fail to consider the impact of implementation of alternatives upon the fuel consumption of the affected permittees; it only considers the fuel use of the BLM. The impact on affected ranches would result in greatly increased fuel consumption due to increased trucking to remote pastures, increased trucking to bring in grain, supplements and hay, and increased machine work to maintain meadows when cattle are forced to remain on them late in the season.

7-17 Regarding the Spring rest alternative on Page 84, it again seems prudent to point out that none of the range treatments spelled out have ever been done on West Antelope Allotment No. 6208 or on Mill Creek Allotment No. 6213 (the two allotments on which the author is a permittee) or on countless other allotments in the EIS area. If these fine results are obtainable, why has the BLM failed so patently in so many cases to carry them out in the past? I strongly question the assumption that treatments and improvements of the magnitude as set out will ever be accomplished.

7-18 Also, the vegetative impact study is based so much on incomplete data and estimates that its validity is highly suspect. There is just no basis for information like this to be accepted as reliable. Always showing is the fact that the BLM has no proper, reasonable, reliable long term inventory of vegetation assets, conditions and trend. Without such an inventory the agency is relying on guesswork and estimates. The public is entitled to more than this in such a vital matter, and the process should be placed in abeyance for a matter of years until the agency can secure reliable data as a foundation for the EIS. This observation is apropos to each of the alternatives in the draft EIS.

7-19 The draft EIS as written does not fulfill the requirements reasonably expected. It lacks one of the most logical of alternatives, it is based on estimates, it lacks long term trend and use information, and it incorporates assumptions whose validity are not reasonably addressed and considered. The draft EIS on the Gunnison Basin should be placed on hold, no administrative management decisions should be based upon it, and copious and extensive efforts should be launched to get realistic information on range condition and trend of BLM administered lands. The BLM should hire outside professional experts to assemble this information and make trend judgments since the BLM has apparently been unwilling or unable to do it in the past. Since several people who contributed to this draft EIS are also administrators of BLM grazing in the Gunnison Basin, the prudence to bring in competent outside authorities to assist in the process seems rational. It is extremely difficult for an artist to sit objectively in judgment of his own work.

7-15 In order to provide a common base for impact quantification and comparison in an EIS, impact analysis assumptions are necessary. As noted throughout the EIS and in the methodology appendicies, these assumptions are based on best professional judgement with the data on hand.

7-16 As stated on page 83, there could be increased use of fuel for livestock management by permittees due to implementation of the proposed action. However, since it is not possible to predict how individual ranchers would choose to work within the parameters of the selected rangeland management program, it is not possible to predict fuel usage.

7-17 See response to comment 7-12.

7-18 See response to comments 7-1 and 7-2.

7-19 As described on page 1 of the Draft, both the BLM planning and EIS processes are interdisciplinary efforts involving input and coordination by resource specialists representing a wide diversity of expertise. The interdisciplinary team concept was used in gathering resource data, identifying resource capability and opportunities for resource use, developing Management Framework Plan recommendations, developing the alternatives for the EIS, and assessing the impacts of the alternatives examined in this EIS. As required by the Council of Environmental Quality, a list of contributors to this EIS and their qualifications is presented on page 159 of the Draft.

Respectfully submitted,

Kenneth P. Ochs

Kenneth P. Ochs, Partner
Ochs Brothers

8

June 11, 1980

Mr. Henri Bisson
U.S. Dept. of Interior
Bureau of Land Management
Montrose District, Colorado

Dear Mr. Bisson:

I want to thank the Bureau of Land Management for allowing me to comment on the Gunnison Basin Livestock Grazing Environmental Impact Statement. After reading the report, it was obvious to me that some type of better management and range improvement was necessary. Soil compaction, erosion, impacted riparian habitat and possible competition for food between wildlife and livestock are just some of the areas that are in need of improvement.

I understand that the BLM is in an impossible situation where they have to manage the land to the land's best potential and satisfy local and other users' interests. This is done through the multiple use concept. However, in a situation where there has been misuse or overuse, steps must be taken to correct the problem even though it could have a negative impact on certain interests. To me, I believe the grazing situation in the Gunnison Basin is a prime example of this situation.

What disturbs me about the Spring Rest Alternative is that it seems to be a slanted effort toward a heavier future grazing of livestock. One reason I feel this way is the consideration of the number and degree of rangeland management facilities planned under this alternative. I feel this is excessive. I believe that these improvements (not all but some) could have an adverse impact on the visual and recreational impact, pg. 112.

Other concerns that I have are the following:

8-1 (a) I believe that no land treatments or range projects should be constructed at all in the Powderhorn Primitive Area or any proposed or potential wilderness area. Livestock grazing should be greatly reduced or prohibited in these areas, pg. 113.

8-1 See response to comment 6-5. Livestock grazing is a compatible use under the Wilderness Act.

8-2 (b) I have concern for any cultural resources that could be damaged by livestock or vandalism, pg. 108. I would like to see the important cultural resources protected.

8-3 (c) I have a strong concern over possible livestock damage to aquatic/riparian habitat (first paragraph, pg. 104). This should improve under this alternative but my concern is that it may not improve to its potential.

These are just some of the concerns that I have over the Spring Rest Alternative. I do applaud the BLM for elimination of livestock grazing along the East Fork of Powderhorn Creek, Spring Creek and the north one-half of West Fork Antelope Creek. I also applaud the BLM for its willingness to improve the range condition. Watershed values and wildlife habitat are just as important as livestock grazing. Natural conditions of the range should be sought; then comes the proper management. The range must be given a chance to recuperate.

I am not totally against the Spring Rest Alternative because I realize that in the long term the range will be in better condition with regard to strong environmental concerns. However, I would suggest that perhaps a combination of the Spring Rest or Fall Rest concept should have some concepts from the Optimize Wildlife and Watershed Values. I like the goals of decreasing sediment, decreasing soil compaction, increasing better forage and others.

I would like to comment more on this draft plan, but time prohibits me at this time. Please keep me informed on future happenings. Again, thank you.

Sincerely yours,

Clinton D. Nagel

Clinton D. Nagel
Route 1, Box 90B
Buffalo, WY 82834

8-2 Compliance with the terms of the programmatic memorandum of agreement between BLM, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers should protect cultural resources. (The memorandum is included in this document as Appendix CRM-1.)

8-3 A special rest schedule is proposed for designated riparian pastures (see page 9, Draft).

Natural Resources Defense Council, Inc.

9

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June 13, 1980

Henri Bisson
Gunnison Basin EIS Project Manager
Bureau of Land Management
P.O. Box 1269
Montrose, Colorado 81401

RE: Draft Gunnison Basin Livestock Grazing Environmental Impact Statement

Dear Mr. Bisson:

I have briefly reviewed the above-captioned draft environmental impact statement (EIS) and wish to submit the following comments on its contents on behalf of the Natural Resources Defense Council, Inc. (NRDC).

As you may already know, NRDC, a non-profit environmental membership organization, has long been concerned about the management and current conditions of the publicly-owned rangelands in Colorado and other Western states. We support the efforts of the Bureau of Land Management (BLM) to manage livestock grazing on these lands according to the multiple-use and stewardship principles mandated by the Federal Land Policy and Management Act (FLPMA) as well as to comply with the requirements of the National Environmental Policy Act (NEPA) in so doing. Indeed, we believe that adequate range EIS's are the key means by which the management actions necessary to comply with FLPMA's mandates can be identified and their implementation supported.

The instant draft EIS reveals that a number of serious management problems exist in the Gunnison Basin Resource Area. These include, for example, too early spring grazing, high erosion rates, and conflicts between livestock use and wild-

27

life, recreational and riparian resources. The draft also reveals that, as the result of these and other problems, the publicly-owned resources of the area have been, and are being, adversely impacted. Finally, the statement acknowledges the need for prompt changes in existing practices, including reductions in livestock use, in order to remedy these problems and improve current resource conditions.

The draft EIS evidences a sincere intention to improve the management of livestock grazing in the Gunnison Basin. Many of its features are noteworthy, including its emphasis on the importance of proper stocking rates; its recognition of the fact that grazing systems are not panaceas; its inclusion of a schedule for allotment management plan (AMP) implementation;[1/] its differentiation between the vegetative impacts attributable to range treatments and those attributable to other management proposals; its liberal use of research data;[2/] and its recognition of the economic value of the area's non-livestock resources. Nonetheless, the draft treats a number of important topics superficially or not at all. These are discussed below.

28

1/ The draft fails to make clear whether the same AMP schedule will be followed regardless of the management alternative ultimately chosen. Even more importantly, it does not reveal the criteria which were used to develop the proposed schedule. The final EIS must remedy these deficiencies. In addition, we believe that the implementation schedule ultimately adopted must give the greatest priority to areas in which accelerated and/or serious resource degradation is now occurring. Finally, as discussed below, we believe that the final statement cannot simply assume that the funds needed to implement the proposed action will be forthcoming.

2/ The draft lacks any information about the 34 AMPs which have already been implemented in the EIS area. The results of such plans should be discussed in connection with the predicted benefits of management systems, as well as in connection with the basic proposal to implement intensive management on the vast majority of the lands in the EIS area.

9-1

9-2

9-3

9-1 The AMP schedule depicted on page 20 of the Draft was our best estimate of a likely implementation schedule at the time the document was prepared. The actual schedule that is decided upon after the Program Decision Document will depend on alternative selected, funding and manpower timing, and resource need.

9-2 See response to comments 6-7 and 7-12.

9-3 The information for all allotments was aggregated for display purposes, including that on the 34 existing AMPs. the interdisciplinary analysis indicated varying degrees of success on the existing AMPs. Some AMPs were proved to be successful in meeting the objectives, however, others were not as successful because grazing schedules were not properly followed, some AMPs were over allocated, and wildlife forage allocations were not properly made. The proposed action, in considering this situation, included measures identified as necessary for attainment of existing AMP objectives. The 34 existing AMPs would be revised to meet the standards set forth in the MFP and EIS. If current objectives are within the constraints of the land use plan, the AMPs would continue as presently implemented. Those that do not meet the constraints of the land use plan would be amended. The proposed action attempts to correct these difficulties, and the information gained from the first AMPs would be used to formulate future AMPs.

First, the draft contains no actual use figures or estimates for livestock use of the Public Lands in the Gunnison Basin Resource Area. Moreover, although several of the alternatives, including the proposed action, contemplate reductions in livestock use, the draft fails to indicate whether those reductions will be based on the total permitted livestock use, which is supplied, or the current use. In many areas of the West, ranchers are currently running fewer livestock on the Public Lands than they are authorized to run. In such cases, reductions based on permitted use are merely "paper cuts" and will not relieve abused resources or produce predicted benefits. Accordingly, the final statement must provide at least
9-4 current use estimates and make clear the base from which the contemplated reductions will be taken.

Second, the draft wholly ignores one new, especially important Bureau program -- Areas of Critical Environmental Concern (ACECs). Such areas are defined as those "where special management attention is required . . . to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes. . . ." FLPMA, § 103(a). The Bureau is required to "give priority to the designation and protection of ACECs" in land use planning, § 202(c)(3), and its regulations provide for their identification in the planning process. See
9-5 43 C.F.R. Part 1600 (1979). The complete lack of attention to ACECs will have to be corrected.

The draft's treatment of riparian areas will also have to be improved. Bureau policy recognizes the importance of riparian areas as well as the need to protect and restore them in connection with grazing management. See Wetland Riparian Area Protection and Management, BLM Manual § 6740, (Oct. 1, 1979). These regulations provide that "all measures to minimize the damage and to preserve and restore" riparian areas must be considered. Id., § .13C (emphasis in the original). Bureau instructions require that "[p]roposed actions in grazing

9-4 Actual use figures are not uniformly available throughout the EIS area. The licensed use figures were used as a common base for impact reductions and analysis. The monitoring program outlined on page 21 would provide for additional adjustments if studies indicate that grazing capacities differ from those.

9-5 At the time that URA and MFP recommendations were developed, no guidance existed relative to identification and designation of ACECs. However resource specialists attempted to identify areas that may have values requiring special management attention. These areas were presented to management and a decision was made to defer ACEC designation until guidance is established. These and possibly other areas will be considered for ACEC designation. These areas will be given special consideration during implementation of whatever rangeland management program is ultimately decided upon, to insure that special values are protected.

EIS's must include programs to ensure proper management of wetland, riparian, and floodplain areas." They also note that riparian areas "are particularly sensitive to, and easily impacted by grazing use. Thus, allocations must take into account not only the vegetation allocation itself, but also the associated impacts which will occur (i.e., animal congregation and trampling)." Instruction Memorandum No. 80-225 to all Field Officials from Assistant Director, Renewable Resources, Subject: "Requirements for Fish and Wildlife Habitat Protection and Enhancement in the Rangeland Management Program" (Jan. 15, 1980), p. 1. (Emphasis added.)

The draft acknowledges the importance of riparian areas as well as some of the problems posed by livestock use of them. See, e.g. pp. 63, 94.[3/] However, it makes no attempt to analyze the adequacy of the actions proposed for such areas in terms of Bureau-wide riparian policies, goals and requirements, or even in terms of local conditions within the Resource Area. For example, it does not explain why livestock use is proposed to be excluded from some areas but not others, which are in the same or worse condition and which possess equal, if not greater "opportunities for improvement." (p. 67.) Similarly, it does not explain how "associated impacts" of grazing were taken into account in allocations for those areas not protected from livestock. Moreover, it does not state what the "goals" for riparian areas are, p. 3, or make any attempt to determine when those goals will be achieved. Finally, although the draft indicates that those goals could be met more quickly by providing additional protection for riparian areas, Id., it is not clear whether any additional measures are contemplated by any of the alternatives under consideration, including the "optimize wildlife and watershed values" alternative.

9-6

[3/] All page references are to the draft EIS.

9-6 Throughout the planning process, goals were developed to maintain and improve riparian habitat consistent with BLM policy and regulations. To achieve these goals, the MFP/planning process evaluated riparian areas as to suitability for improvement, taking into account public access, percentage of public land involved, terrain, and anticipated response, and resource conflicts. Page 9 (Draft) lists the criteria which would guide the formulation of specific riparian objectives during AMP development. Through the interdisciplinary process, recommendations were made for riparian management. To achieve the goals specified in the MFP, the following riparian management was considered: (1) eliminate livestock grazing, (2) reduce wildlife and livestock vegetation allocations, (3) eliminate livestock use except for trailing, (4) implement a special riparian rest schedule, or (5) implement rest schedules consistent with the remainder of the AMP. All alternatives except no-action and elimination of livestock would utilize riparian management outlined on page 9. The impact of this riparian management is assessed in Chapter 4.

Without such information, neither members of the public nor the decision-maker can be assured that ultimate decisions will, in fact, ensure proper management of these critically important ecosystems.

The draft's treatment of range "improvement" practices, including vegetative treatment projects, is extremely superficial. Virtually all of the alternatives considered, including the proposed action, contemplate extensive vegetation treatment practices for the Gunnison Basin Resource Area. Indeed, the "optimize wildlife and watershed" alternative contemplates more extensive treatments than even the proposed action or the fall rest alternative.[4/] In the past, such treatments have been undertaken to benefit livestock and have resulted in severe environmental impacts. The draft predicts that not only livestock, but also soils, vegetation and wildlife, will benefit from the manipulation projects contemplated by at least these alternatives.[5/] It presents none of the information needed to substantiate these predictions, however.

For example, the EIS does not explain why these treatments are being considered or what their relationship is to overall management requirements.[6/] It does not present the criteria

9-7

9-8

[4/] Although the alternatives considered, including the proposed action, do appear to contemplate a range of livestock use, we are concerned about the draft's failure to consider less extensive reliance on intensive management, range improvement practices and land treatments. A full spectrum of alternatives requires consideration of non-intensive management practices (later turn-out dates, proper seasons of use, rotation and deferment of use, etc.) with "improvements" and treatments limited to non-intensive goals and objectives and/or rehabilitation.

9-9

[5/] The draft suggests that some wildlife species will not benefit from these treatments, p. 103, but does not identify them.

9-10

[6/] At best, these reasons can be inferred from research reports, see, e.g., p. 84, or from the objectives of the alternatives.

9-7 The levels of treatments recommended for all alternatives were developed through the interdisciplinary process. Treatments proposed under Optimize Wildlife and Watershed are designed to benefit primarily wildlife, watershed, and soils (page 103), while the treatments proposed in the Optimize Livestock Alternative are to maximize livestock benefits. The proposed action includes treatements to benefit wildlife, watershed, soils, and livestock.

9-8 Outlined on pages 290 and 291, premices #3 and #4 point out the need for sagebrush control on sagebrush-dominated range sites. Literature supports the statement ",as the sagebrush composition increases, the condition of the vegetation decreases. Vegetation treatments significantly increase production, cover, condition, and trend of sagebrush-dominated range sites." It is inferred that an increase in production, cover, composition, and trend of sagebrush-dominated range sites would be beneficial to livestock and by producing more forage (see page 84 and premise # 6 page 292), soils (page 96), "the most significant erosion reduction is anticipated in locations where vegetation treatments would be implemented", wildlife, (page 34) the "objectives would be to minimize soil erosion, especially accelerated erosion, increase plant density expand crucial wildlife winter habitat, and improve water quality and increase quantity."

9-9 The EIS attempts to analyze the impacts of a broad range of alternatives, from maximizing intensive use to maximizing non-intensive use. Different levels of rangeland improvement are also assessed. This range of analysis will give decision makers a wide basis for comparison in selection of an alternative or alternatives. However no decisions will be made until after completion of the Final EIS and the MFP Step III. The rangeland management program selected could contain all or parts of any alternative analyzed in the EIS,

9-10 Table 4-2 indicates habitat quality trends by species by alternative, which includes the various levels of treatment.

utilized to identify the allotments or areas in which such projects will be considered. It presents no information about current conditions for livestock or wildlife in those areas.

9-11 It provides no explanation for the mixes of various treatment methods "assumed" under each alternative, see, e.g., p. 15, and no criteria for the ultimate selection of any one method. It

9-12 does not explain why land treatments have been proposed for wilderness study areas, despite the fact that they "would not be allowed" under the Bureau's Interim Management Policy for such areas. (p. 113.) No information about the success or

9-13 failure of past projects in the area, including seedings, is provided. Criteria designed to protect some wildlife values are proposed for some activities -- e.g., sagebrush spraying,--

9-14 but not for others, and for some alternatives, but not for others. The scientific or other bases for these criteria are not identified and their adequacy is assumed. The relationship between any of these criteria and the ultimate land use plan for the area is unclear. Impacts are discussed in only very general terms. No cost-benefit analysis of these activities is presented for any alternatives.[7/] Absent such information, there is no way readers can judge the propriety of proposed

9-15 treatements. Cost-benefit analyses must be provided to justify the expenditures contemplated.

The need for, as well as the suitability and impacts of, proposed treatments must be provided in far greater detail in order to permit reasoned evaluation of these proposals. Fur-

9-16 ther, specific criteria for selection of treatment areas and methods must be adopted in order to guide and constrain selection of treatments, as well as to justify the proposed future reliance on environmental assessments. We believe such criteria should incorporate the following standards:

7/ Exact specifics are not necessary to perform such assessments: they can be based on the scale of improvements contemplated.

9-11 The mix of various methods of treatments was presented for analysis purposes only. The choice of treatment method would be determined during AMP development. The actual mix of treatments would be determined through a site specific environmental assessment considering the resource conflicts, anticipated benefits, impacts, and the cost benefit ratios.

9-12 See response to comment 6-5.

9-13 The information on past projects in the area is incorporated in the URA for this area (BLM 1979a).

9-14 The standard design features developed in the MFP for treatments (page 18) and those for facilities (page 19) would be applied to the treatments and facilities proposed under any alternative. These standard design features are requirements of BLM policy and guidance. They have evolved through field practice with literature and legal support, and are intended to protect the environment while the long term goal of improving the rangeland is achieved.

9-15 Table 2-9 (pages 38-40) outlines the costs to implement the alternatives as well as the expected benefits. Additionally, a cost benefit analysis would be completed for each range improvment project as a part of the design and development stage of the AMP.

9-16 The design standards and objectives of vegetation treatments and range improvement projects have considered these criteria, see pages 17, 18, 19 and 20. Additional site specific objectives and criteria will be evaluated by site specific assessments and tiered to this EIS for all vegetation treatments. See response to comments 9-11 and 17-10.

(1) treatments will only be proposed in areas that would not be expected to respond to grazing management systems within a reasonable period of time; (2) treatments will only be proposed in areas in which ecological factors, such as soils and precipitation, will ensure favorable response, including successful seed germination and seedling establishment (Cf. Fn. 5, p. 303); (3) treatments will not be undertaken in known critical wildlife habitat areas or riparian ecosystems unless called for in approved habitat management plans or programs; and (4) treatments must be demonstrably designed to serve multiple uses and must be cost-effective. Because decisions to engage in land treatments as well as other range "improvements" are essentially decisions to allocate the lands involved to livestock use, such criteria must be incorporated into the area's land use plan.

As indicated, we have similar concerns about the proposed fences and water developments. The draft acknowledges the adverse impacts that such actions may have on wildlife, but makes no attempt to relate any of the proposals to wildlife habitat areas. It provides no criteria to ensure that critical areas will be protected and that wildlife needs will be met in the selection of project locations. Appropriate criteria, similar to those outlined above, must be developed and incorporated into the land use plan to ensure that these projects have multiple use benefits and do not harm wildlife.

33

The draft's treatment of impacts to terrestrial wildlife is deficient in other respects as well. The analyses focus almost entirely on the forage requirements of big game animals and ignore the habitat requirements of those species as well as other wildlife species. Although the draft acknowledges that wildlife will be affected by two key features of the proposed action and the fall rest option -- i.e. period of use and utilization -- it makes absolutely no attempt to analyze the impacts of these features on the wildlife of the area.

9-17

9-17 These impacts are discussed in Tables 4-2 and 4-3.

Monitoring is also treated in insufficient detail. Monitoring -- i.e., methods, timing, recordation, etc. -- is a crucial element of whatever land use plan is ultimately adopted by the BLM for this area. Without adequate monitoring, there is no way to verify progress toward basic plan goals, no way to quantify and support any adjustments that may be needed, no way to quantify and reallocate increased forage production and no way to demonstrate the benefits of investing tax dollars in this area. A comprehensive discussion of the monitoring
9-18 program must be provided, and its costs should be separately noted.

Costs generally need more attention. In addition to ignoring the need to justify proposed range "improvements" by cost-benefit analyses, the draft explicitly assumes that the funds needed to implement the action ultimately selected will be forthcoming. We submit that the Bureau, which has chronically suffered from inadequate funding, simply cannot make this assumption, particularly given current economic problems.
9-19 It is, therefore, absolutely essential that the final EIS address a realistic management program that is not only based on current resource conditions and capabilities, but is also within the Bureau's ability to fund, implement and maintain. Only in this way can the agency demonstrate the need for additional funds as well as ensure that "unnecessary and undue degradation" of the Public Lands will not result if those funds are not available. FLPMA, § 302(b).

Another topic that has not received the attention it deserves in this draft is the area's Management Framework Plan (MFP), both generally and in relation to the alternatives considered. Although the draft contains a table entitled
9-20 "Development of MFP Alternatives," neither the table nor the text explain clearly how the alternatives considered were derived from, or relate to, the recommendations displayed. Although the proposed action seems most closely related to those recommendations, there are unexplained differences: some

9-18 Monitoring is discussed in detail on page 21 in the text. BLM Manual 4413 will guide our monitoring procedures. The costs of monitoring would be included in the BLM work months outlined on Table 2-9 (page 40).

9-19 See response to comment 7-12.

9-20 The no-action alternative and the elimination of livestock grazing alternative are required by legal mandate and BLM policy. The other alternatives assessed in the Draft EIS came from recommendations of resource specialists in Step I of the MFP. All the recommendations in the MFP were developed by the interdisciplinary team and have had full public involvement. The MFP is back up data to the EIS and could not be displayed in its entirety in this document.

of the proposed action's elements, such as those dealing with riparian areas, do not appear to be identical; other elements, such as the utilization levels and elimination of grazing on two allotments, are not even mentioned in the recommendations; and some recommendations, such as restrictions on class of livestock, do not appear to have been incorporated into the proposed action.

9-21

9-22

Simnilarly, although Table 1-1 provides more information about the reasons underlying the MFP II recommendations and the trade-offs involved than many other EIS's prepared by the Bureau to date, it still fails to provide a sufficiently detailed explanation of these recommendations. Some of the reasons underlying key recommmendations, like the recommendations to implement intensive management of livestock grazing and to engage in extensive vegetative treatments, are not provided. The text discusses none of the major trade-offs and contains no evaluation of the rationales which underlie them. Moreover, neither text nor table include any watershed, wildlife or other public interest objectives or requirements for the area. Indeed, the only management "goal" identified concerns livestock. In the absence of such information and an analysis of the degree to which the recommendations will serve as an adequate basis for future management, readers cannot fully understand and evaluate the basic management decision with which this EIS deals -- i.e., the decision to allocate certain lands to livestock use.

9-23

Our final concern relates to the draft's failure to analyze the "suitability" of the lands in the Gunnison Basin Resource Area for livestock use, despite the fact that this is one of the fundamental issues involved in grazing management. Clearly, the BLM cannot assume that all the lands in the EIS area are suitable for livestock use. However, the suitability of these lands is discussed only in the appendix and then only in terms of forage allocation criteria. Application of forage allocation criteria is not a substitute for an analysis of the

9-24

9-21 See text change indicated on errata sheet.

9-22 See page 20 of the Draft EIS.

9-23 As stated in response 9-20, the MFP is back up data to the Draft EIS and is incorporated by reference.

9-24 Through the interdisciplinary planning process, it was determined that continued livestock grazing was a proper and legitimate land use.

capability of the lands involved, and their soils in particular, to sustain livestock use over time. Thus, while we do not dispute the utility of such criteria in making forage allocations, we submit that they should be used only after it has been determined that grazing is in fact a proper use.

Thank you in advance for your consideration of these comments. Hopefully, they will assist you and your staff in preparing a final EIS which will be of optimum value in the selection and implementation of an environmentally responsible range management program for the Gunnison Basin Resource Area.

Sincerely,

Johanna H. Wald

JHW/jt

10

District 10 Regional Planning Commission

Serving the Local Governmental Units within the Counties of Delta, Gunnison, Hinsdale, Montrose, Ouray, and San Miguel

June 11, 1980

RECEIVED
JUN 17 1980
B.L.M. Montrose Dist.

Henri Bisson
Bureau of Land Management
Gunnison Basin EIS Project Manager
P.O. Box 1269
Montrose, Colorado 81401

Subject: Comment on Gunnison Basin Livestock Grazing EIS

Dear Henri:

It is the policy of District 10 that management of Public Lands should result in improved soil, water, and vegetative resources to ensure continued productivity in years to come. With proper management and investment in cost-effective range improvements the goals of soil and water conservation can be achieved while maintaining a relatively high degree of production.

Comments on the draft EIS are:

10-1 1) Much of the development of impacts of alternatives and future situations seems to rest upon data or information about which there is some doubt. Not being equipped with data to support or contradict BLM's data, we can only hope that BLM continues to refine its data base and listen to other experts in order to develop a broader perspective.

10-2 2) Assumptions form the basis for development of impacts of alternatives and future situations. There is some doubts as to the accuracy of these assumptions. Future situations need to be developed with a more detailed explanation of assumptions and an analysis of sensitivity to inaccuracies in assumptions. Comments 3, 4, 5, and 6 present examples of how data and assumptions which are not entirely accurate are suspected of distorting the analysis.

10-3 3) Base level data on vegetative resources was taken during the summer of 1978. This was at the end of a rather significant drought. Range conditions certainly reflected this drought. It is our understanding that BLM has collected additional data during the summer of 1979 and 1980. Addition of this data should create a better perspective on range conditions.

P. O. Box 849 • 238 Main Street • Montrose, Colorado 81401 • Phone 249-2436

10-1 See responses to comment 7-1.

10-2 See response to comments 7-14 and 7-15.

10-3 See response to comment 7-1.

4) The development of the future situations seems to rest upon the assumption that permitees move their cattle onto the BLM as early as their permit allows. This is not the case. Ranchers understand that it is best to wait until the range is ready. The report should take these voluntary conservation efforts into consideration.

10-4

5) The development of future situations seems to assume that full utilization is made of permitted AUM's. This also does not appear to be the case. This needs to be considered.

6) The report does not seem to develop the entire perspective on deer and elk populations. No mention is made of the enormous winter kills through harsh winters as demonstrated by 1978-1979 season when the Division of Wildlife estimates that the loss of deer in the area was approximately 50%. Winter - especially harsh winters - force wildlife to the lower lands. When the carrying capacity of lower lands is exceeded in harsh winters these animals die. Two points are important here: 1) improving wildlife conditions on lands which are utilized by wildlife during spring, fall and mild winters will do little to help wildlife since it is the lack of land during harsh winters which controls population. 2) the available low elevation lands are generally private lands - wintering wildlife represent a significant expense to the rancher. Game management which allows herds to build during mild winters and die off in harsh winters benefits no one and is inhumane. If herds are to be kept artificially high, an effective feeding program needs to be developed - including development of a substance which is edible by deer.

10-5

The Division of Wildlife plans to reduce wildlife levels through increased harvest in an effort to reduce pressure on grazing land and prevent such excessive winter kill. BLM needs to support these efforts.

10-6

The EIS needs to base evaluation of future alternatives upon the lowered wildlife use which is expected. The analysis needs to make sound assumptions, state those assumptions, consider economic impact of wildlife use of private land, show range improvement which is expected from planned reductions in deer and elk populations and indicate the sensitivity of the analysis to assumptions.

10-7

7) The alternatives seem to represent extremes, rather than an optimization of values. For example, an alternative which utilizes range improvements to achieve the following goals (in order of priority) has not been considered.

10-8

a) improvement of vegetative range conditions and reduced erosion to ensure sustained vegetative yield for livestock and wildlife and maintain the integrity of water resources.

10-4 The Bureau acknowledges and appreciates the voluntary conservation efforts of ranchers. However, ranchers are obligated to use permits/liscenses as issued or change them in accordance with regulations. Failure to use the permits/licenses can result in loss of them. Ranchers have a responsibility to maintain their grazing privileges through the terms and conditions of their licenses.

10-5 The winter mortality of the winter of 1978-79 is discussed on pages 100-103 in the Draft. In addition, this section discusses the limiting winter range of big game, and recognizes and assesses the need for reductions in elk numbers. A 43 percent reduction in elk numbers west of Gunnison, a 30 percent reduction east of Gunnison, and a 20 percent reduction in Kysar Basin were assessed.

10-6 See response to comment 7-13.

10-7 These points were considered during the MFP/EIS process. The economics of wildlife use on private lands is the responsibility of the Colorado Oivision of Wildlife. The impacts to range condition resulting from various stocking levels of both livestock and wildlife are assessed in Chapter 4.

10-8 See response to comment 9-9.

b) improvement of riparian vegetation for reduced erosion, better aquatic habitat and sustained yield for livestock and wildlife.

c) continued economic yield for livestock enterprises.

d) recreational use and wildlife considerations.

8) The economic analysis of alternatives needs to be stronger. Throughout the report, no effort is made to optimize between conflicting or complimenting values.

9) The enormous values of range improvements seems to be the outstanding statement in this EIS. An investment of $4 million in improvements is shown to produce an annual yield of $2 million.

In summary, District 10 favors an alternative lying somewhere between the Spring Rest and Optimize Livestock Grazing alternatives. Soil and Water Conservation goals and vegetation improvement should be achieved through range improvements and a higher level of management. Increased Spring Rest and reduced AUM's are effective methods of meeting conservation goals, however, their acceptability is moderated since they are less cost-effective than range improvements and result in a lower economic yield.

The alternative proposed by District 10 would utilize a high level of management, a strong range improvement program, and limited reductions in early season use and overall AUM allocations in order to achieve soil and water conservation goals and improved vegetative yield. This approach would also appear to be beneficial to the improved management of wildlife. This proposed alternative is viewed as being highly cost-effective.

Sincerely,

Warren Comerer
Chairman, Federal Lands
Advisory Committee

sjb

Gunnison County, Colorado

Board of
COUNTY COMMISSIONERS

GUNNISON, COLORADO

June 10, 1980

Mr. Henri Bisson
Bureau of Land Management
Gunnison Basin EIS Project Manager
P.O. Box 1269
Montrose, Co.

RE: Gunnison Basin Livestock Grazing Environmental Impact Statement

Dear Mr. Bisson:

In response to the draft of the Gunnison Basin Livestock Grazing Environmental Impact Statement, we submit these comments:

In reviewing the Statement, Gunnison County's primary focus of concern has been the potential longterm economic and socio-economic effects on ranching in particular and on the Gunnison County community in general. As proposed by the Bureau of Land Management, the preferred alternative lays the groundwork for placing the long-term security of the ranching industry in jeopardy.

Though the development of energy resources in the Gunnison Basin is not at question in this document, it nonetheless plays a catalytic role in the manner in which the preferred alternative could affect the ranching industry. We face in this county a potential doubling of population within the next five to ten years. The addition of those people, while promising economic gain to some, also poses several major problems to the agriculture industry (predictable "people problems" of dogs, trespass, etc.). The upgrading of pay scales and employee benefits, traditional to corporate industry, will decrease the ranchers' ability to compete in an already limited labor market.

The composite effect of human and economic pressures could well force many of our local ranchers to forego their livelihoods and sell to land developers just to maintain solvency. The results are obvious: Productive ranchlands would be lost; ranchers who would choose to remain in ranching would no longer be financially able to do so. What has been an integral part of the local economy and lifestyle would be jeopardized.

As an offshoot of those effects, the county could also be saddled with the expenses engendered by sporadically placed small tract developments. Recreational visitors, who now are allowed access to fishing and hunting areas by cooperative ranch owners, would likely turn to federally managed lands for recreational use; a long-term result of the preferred alternative, then, could be additional operational and management expense to the BLM.

The alternative's equally weighted considerations of wildlife and grazing uses also negate the long-term effects on the ranching industry. Displaced, wildlife has a greater chance of returning to a stable population; loss of grazing, however, for all practical purposes, permanently reduces ranching capacity and potential.

11-1 Throughout our recent series of public input planning meetings ran a common goal: to keep the agricultural option open. The preferred alternative would hinder that.

We submit that the alternative of continuing present grazing allotments (with no cuts), combined with appropriate range management, is cost effective and locally acceptable. We appreciate the opportunity to respond to this draft; should you need further information or comments, please let us know.

Most sincerely,

George E. Means

George E. Means, Chairman
Board of Commissioners,
Gunnison County

GEM/jyw

11-1 The MFP Step II Spring Rest and Fall Rest alternatives would compliment this common goal. The long-term impacts of these alternatives could improve ranch production and corresponding ranch income. In addition to helping improve long-term ranch income in the EIS area, these alternatives would also help improve the other resource values of the area. These two alternatives would also have long-term benefical impacts on vegetation, soil, water, wildlife, and recreation with its corresponding increased economic benefits to the community.

United States Department of the Interior

HERITAGE CONSERVATION AND RECREATION SERVICE
MID-CONTINENT REGION
POST OFFICE BOX 25387
DENVER FEDERAL CENTER
DENVER, COLORADO 80225

IN REPLY REFER TO:

DES-80/18

12

JUN 11 1980

BLM. Montrose Dist.

MEMORANDUM

To: Henri Bisson, Bureau of Land Management
Montrose, Colorado

From: Assistant Regional Director, Land Use Coordination

Subject: Review of Draft Environmental Impact Statement for the Gunnison Basin Livestock Grazing Management Program

In response to your notice, we have reviewed the subject document and offer the following comments for your consideration.

NATIONWIDE RIVERS INVENTORY

The Nationwide Rivers Inventory is a two-phased screening process being conducted by the Heritage Conservation and Recreation Service (HCRS) to identify the best remaining free-flowing rivers in the nation that may merit protection at the Federal, State, or local level. Phase I of the inventory, focusing on streams or segments still in a relatively natural, undeveloped condition, has been completed nationwide. Phase II, which will consider such positive factors as recreation and wildlife values, is just being initiated in the western regions of HCRS.

Only one stream in the Gunnison Basin Resource Area was identified in Phase I as meeting the established criteria. This is the Animas River, from Animas City to Mineral Creek. It appears to roughly form the boundary between Allotments 8906 I and 8907 I.

President Carter's August 2, 1979, "Memorandum for the Heads of Departments or Agencies" directs that:

> Each Federal agency shall, as part of its normal planning and environmental review process, take care to avoid or mitigate adverse effects on rivers identified in the Nationwide Inventory prepared by the Heritage Conservation and Recreation Service in the Department of the Interior. Agencies shall, as part of their normal environmental review process, consult with the Heritage Conservation and Recreation Service prior to taking actions which could effectively foreclose wild, scenic, or recreational river statua on rivera in the Inventory.

12-1 We urge the Bureau of Land Management (BLM) to manage the lands adjacent to the Animas River in a manner which will preserve the visual qualities of the stream corridor. The final statement should indicate what effects, if any, the proposed plan will have on these qualities.

41

12-1 As stated on page 108 of the Draft, livestock grazing per se would have no significant impact on visual resources. Since no range improvements or treatments are planned along the Animas River, there would be no impact due to the proposed action.

Mr. Henri Bisson
Page 2

NATIONAL NATURAL LANDMARKS

12-2 A large portion of the Slumgullion Earthflow National Natural Landmark is located on BLM lands in Hinsdale County (Allotment 6525). A copy of the Landmark Brief is enclosed. As with the river segment described above, we suggest that the BLM plan for the protection of natural and scenic values, and describe any adverse impacts in the final statement.

NATIONAL HISTORIC LANDMARKS

Two National Historic Landmarks are located within the Gunnison Basin Resource Area. The Silverton Historic District encompasses not only the town of Silverton, but also the adjacent mountain sides (Allotments 8906 I, 8907 I, 8904 I, 8905 I, 6521, 8900 I). The Durango-Silverton Narrow Gauge Railroad follows the portion of the Animas River described above. We are pleased to note that neither would be affected by any of the alternatives under consideration (p. 74).

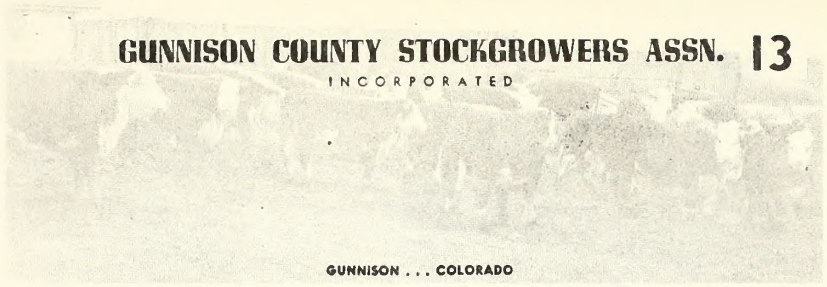
Robert J. Arkins

Enclosure

12-2 Allotment 6525 is presently an unallotted livestock grazing allotment (see Appendix RM-1, page 192). Neither treatments nor livestock grazing are proposed for allotment 6525 and the Slumgullion Earthflow National Natural Landmark.

GUNNISON COUNTY STOCKGROWERS ASSN. 13

INCORPORATED



GUNNISON . . . COLORADO

June 14, 1980

RECEIVED
JUN 18 '80
B.L.M. Montrose Dist.

Bureau of Land Management
P.O. Box 1269
Montrose, CO 81401

Attention: Henri Bisson, Project Manager

Dear Sir:

The Gunnison County Stockgrowers, an association of approximately 100 members in Gunnison County, Colorado, wish to offer the following comments concerning the recent EIS draft for the Gunnison Basin.

We wish to point out that ranching is one of the main industries in the Gunnison Watershed and contributes a large share of the tax base for Gunnison County. Nearly all the members of Gunnison County Stockgrowers are permittees on BLM and are dependant on these grazing lands for their ranch operation. These ranches lie within an area that is more than 80% federally owned and there is no private land available for pasture to replace the federal grazing lands if it were economically feasible to purchase pasture. BLM grazing was set up by enactment of the Taylor Grazing Act, the purpose of which was to stablize the livestock industry. If the grazing on BLM lands is reduced to such an extent that it creates a hardship on the ranching industry, it will result in a serious adverse effect on the economic base of Gunnison County as many of these ranches cannot continue to operate.

13-1 We feel that the spring rest alternative proposed cannot and should not be implemented in this area. The schedule as proposed considers only the number of days grazed with no consideration of range soil conditions. Some soils are raising their maximum, and due to their own make up would never raise any more grass whether rested one year or three years. These areas do not have the potential to raise more feed, while other areas may have soil composition that will show rapid regrowth and will benefit from systematic grazing. Soil analysis, utilization of feed and length of season must be given due consideration.

13-2 The range trend analysis was taken concurrently with range condition and long term trend information is apparently lacking in much of the EIS unit.

13-3 The proposed action calls for an average reduction of 26% for livestock grazing while reducing wildlife only about 6%. Wildlife numbers on the BLM must be held to the numbers that can be supported by available winter range. It should be

13-1 Page 84, Appendix V-2, and Table 4-1 show the expected increase in production, cover, condition, and trend through reductions, treatment, and systematic grazing. Site specific areas have been delineated showing where a change or no change is expected in the vegetation. This information can be found in the URA/MFP land use plan, which is backup material for the EIS. The map enclosed in the EIS is of a scale on which detailed information cannot be shown.

13-2 See response to comment 7-1.

13-3 See response to comment 10-5.

kept in mind that at present in many areas a large portion of wildlife winter range is private land. During the 1950's and 1960's many permittees took substantial cuts of 30% to 40% on BLM and we now feel that the Division of Wildlife should take their cut and be forced to manage their game herds to fit the available range as commensurate to winter range availability.

Another major factor is fence damage by game. Permittees are required to repair and keep up fences. Much of the damage is caused by game and generally requires a great deal of time for repair each spring prior to turning out cattle. Often times, the only damage to fences is game and has to be done over and over several times. We feel that the Division of Wildlife should assume responsibility for their share of fence damage by game.

An intensive study should be made on riparian areas and their uses and effects on livestock grazing and wildlife. We would suggest that there is probably far more damage to riparian areas by wildlife than livestock as deer and elk tend to hang in these areas causing sloughing of banks along streams and tramping down the willows. Riparian areas are the most critical areas on the ranges because that is where the water is and riparian zoning ultimately reduces the grazing ability of these ranges tremendeously by setting definite grazing patterns and creating areas where cattle bunch.

13-4

We feel that the ranges in this area have a great deal of potential for improvement and the emphasis should be given to carrying out the proposed improvements such as spraying, reseeding and water improvements to the fullest and ultimately increasing the grazing ability of the ranges.

We appreciate the opportunity to present our views and to commend the people who have prepared the EIS. We sincerely hope that before finalization of the EIS more consideration will be given to a combination of alternatives based on a great deal more data over a longer term, and then more realistic management based on utilization and soil condition, as well as economic impact on the surrounding area.

Thank you very much for your consideration in this matter.

Yours very truly,

Bob Irby
President

13-4 In addition to the continuing studies of the Gunnison Basin Resource Area, described in response to comment 7-1, additional riparian area studies are being conducted during 1980 and will continue into 1981-82. These studies will be analyzed and the specific data would be incorporated into development of the AMPs.

14

Ochs Brothers
Box 702
Gunnison, CO 81230
June 16, 1980

RECEIVED
JUN 18 '80
B.L.M. Montrose Dist.

Mr. Henri Bisson
Bureau of Land Management
Gunnison Basin EIS Project Manager
P.O. Box 1269
Montrose, CO 81401

Dear Sir:

These written comments on the draft enviromental impact statement on proposed grazing management in the Gunnison Basin are in addition to my verbal comments on the subject presented at the public hearing at Gunnison, Colorado, on May 21, 1980, and my written comments contained in my letter to you of June 11, 1980; and these comments should be merged with, and made a part of my overall testimony on the matter.

14-1 The draft EIS is seriously deficient from the standpoint that it fails to include historical data relating to past grazing use in each allotment comprising the basin; it fails to recite on each allotment historical numbers of animals grazed since each allotment was organized, practices preceeding organization of each allotment, range conditions prior, at time of, and subsequent to organization of each allotment, type of grazing and season of use since organization of each allotment, specific and accurate long term vegetative trend of each allotment from time allotment was organized to present time, historical game use of each allotment prior to, and since organization, specific historical grazing management practices on the part of BLM on each allotment since BLM was designated responsible for the basin, range improvements on each allotment initiated and paid by BLM and initiated and paid by permittees since organization of each allotment, specific long term temperature and rainfall data on each allotment dating back to the time of organization of each allotment, historical stream flow figures on each allotment since organization of each allotment, what other uses besides grazing has each allotment been subjected to over the years since each allotment was organized, trespassing record on each allotment since organized and specific actions on the part of BLM to identify and correct problems on each allotment since each allotment was organized.

14-2 Further, the draft EIS fails to reflect any effort on the part of BLM to solicit or use input from permittees on each allotment to devise and place vegetative measurement procedures and tests to accurately and fairly monitor each allotment over its entire area. No efforts were made by the BLM to

14-1 See response to comment 7-1.

14-2 See response to comment 7-1.

elicit and use permittee input on each individual allotment to garner or corraborate pertinent historical data on each allotment.

Reasonable assumptions and decisions relating to each allotment in the basin over the next 20 years cannot be made without consideration of the historical aspects of each allotment which I have indicated in this letter to be missing from the draft EIS. This deficiency of missing historical data must be cured, and the draft EIS must be expanded to include the historical data before the draft can reasonably be adjudged as adequate and before the process can continue toward writing a final enviromental impact statement on the basin.

Respectfully submitted,

Kenneth Ochs

Kenneth P. Ochs, Partner
Ochs Brothers

15

National Wildlife Federation

NATURAL RESOURCE CLINIC
FLEMING LAW BUILDING
BOULDER, COLORADO 80309
303/492-6552

June 16, 1980

RECEIVED
JUN 18 '80
BLM, Montrose Dist.

District Manager
Montrose District Office
Bureau of Land Management
Highway 550 South
P.O. Box 1269
Montrose, CO 81401

Dear Sir or Madam:

We appreciate the opportunity to comment on the Draft Environmental Impact Statement on Livestock Grazing Management in the Gunnison Basin/American Flats area.

The National Wildlife Federation, with over 4.5 million members and supporters, is dedicated to the wise use of America's natural resources. The Federation believes that the Bureau of Land Management's responsibility to insure long-term productivity and conservation of public land resources is a public trust obligation of a high order.

We generally support BLM's proposals to manage grazing in the Gunnison Basin to promote healthy range conditions and to remedy problems resulting from past overgrazing and other undesirable practices. While we recognize that there will unfortunately be some short-term adverse economic impact on the livestock industry resulting from reduced grazing, we firmly believe that healthy rangeland is in the long-term best interests of that industry, as well as the best interests of wildlife and of other land users.

Our specific comments relate primarily to the question of why the spring rest alternative is proposed in preference to the fall rest alternative. The Draft EIS points out many ways in which the fall rest alternative appears superior. It identifies no ways in which the fall rest alternative is inferior to spring rest. It is therefore very hard to say why the spring rest alternative is proposed. We also believe that there is reason to believe that the proposed grazing allocations are too high, and that the DEIS does not justify adequately the selected level of grazing use.

We also note that while the DEIS clearly identifies past damage to high altitude range from sheep trailing, there is no indication of any intent to try to restore such lands.

Specific comments are as noted below:

1. Fall Rest vs. Spring Rest.

Throughout the DEIS, the spring rest alternative is described as the "proposed action." Yet in the Conclusion of the Summary (pp. viii-ix) it is stated that "there would be few differences in impacts between the spring rest and fall rest alternatives, so either alternative or a combination of the two would be the preferred course of action."

In fact, the DEIS notes a number of aspects in which the fall rest alternative appears to be better than the spring rest alternative:

a. In the long term, the fall rest alternative would result in production of nearly 100 lbs/acre of vegetation more than the spring rest alternative (Table 2-9).

b. In the long term, the fall rest alternative would result in slightly higher cover than the spring rest alternative (Table 2-9).

15-1 c. In the long term, fall rest would restore nearly 20,000 more acres to good condition than would spring rest (Table 2-9).

d. In the long term, fall rest would allow both more wildlife use and more grazing use than the spring rest alternative (Table 2-9).

e. Fall rest would produce more good aquatic/riparian habitat than would spring rest (p. 120).

f. Impact to range users would be less than the fall rest system than the spring rest system.

g. More AUMS would be made available under the fall rest alternative (p. 121).

It also appears likely that the fall rest schedule would involve less conflict with hikers, campers, fishermen and other users, since rest would occur during July and August, the periods which presumably see greatest recreational use.

15-1 The differences in impacts between the Spring Rest and Fall Rest alternatives has been noted in the EIS. The final decsion could use both systems as a management tool, this would allow the resource manager greater flexibility in implementing a system which would best fit the resource condftions of a given allotment. By using a combination of these systems throughout the EIS area the net effect could be better than any one of the proposed systems used as a blanket approach.

Given these advantages, and the fact that there are no adverse impacts identified with fall rest in excess of those associated with spring rest, it is hard to understand why spring rest is the preferred alternative. The Final EIS should explain why the spring rest alternative is proposed in view of the many identified advantages of fall rest.

2. Grazing Allocations.

In Appendix V-3 (p. 289), the DEIS states that "allocation levels are of greater importance than grazing systems in determining vegetation response."

This is a good premise, supported by numerous research studies.

However, we can find no basis for the conclusion that the grazing reductions are adequate to achieve the stated objectives in terms of range improvements. The data presented in the DEIS are not sufficient to support the conclusion that grazing reductions are adequate.

Consider the following hypothetical calculation:

From Table 2-9 (p. 38), there appear to be 306,000 acres of grazable land in the EIS area with an average of 518 lbs/acre/year.

306,000 acres
x 518 lbs/acre/year
158,508,000 lbs/year, annual forage production.

At 1000 lbs/AUM

158,508,000/1000 = 160,000 AUM's (approx).

If we make these four assumptions:

(1) All forage is totally available;

(2) Both livestock grazing and wildlife distribution are uniform across all allotments;

(3) All forage is palatable to all classes of livestock and wildlife; and

(4) The allowable use figure for all species is 50%,

then: 160,000
x .50
80,000 AUM's allocated.

Thus, if all four assumptions were true, the approximately 78,000 AUM's allocated initially under most alternatives would be acceptable.

However, we have serious questions about the accuracy of those assumptions in an area like the Gunnison Basin. The EIS does not provide enough data to test those assumptions.

We suspect:

(1) that 20% or more of the forage is probably unavailable;

(2) that livestock grazing is never uniform in mountainous terrain; and

(3) that on ranges in fair and poor condition there are many unpalatable plants.

If we were to estimate that one-third of the plants on such ranges are totally unpalatable (or, put another way, that one-third of the plants had a proper use factor of 0%), we would get a much different result. If the remaining plants have an
15-2 average 40% proper use factor,

160,000 AUM's
- 50,000 (unpalatable species)
110,000
x .40 (proper use factor)
44,000 AUM's available to allocate.

We are not suggesting that 44,000 AUM's is the precise proper figure. We are suggesting that more realistic assumptions lead to a strikingly lower result than the proposed 78,000 AUM's.

We are also suggesting that the DEIS does not justify the 78,000 AUM figure, and that detailed information on the species composition of the range is needed to justify any given figure.

BLM should thoroughly and seriously re-evaluate the proposed grazing allocation to see whether it is proper in terms of real-world, rather than hypothetical range conditions. As demonstrated above, the proposed level of grazing may be inconsistent with long-term healthy range conditions and the best interests of a sound livestock industry.

3. Treatments.

The discussion of herbicide spraying on pp. 15-16 does
15-3 not mention any adverse effects on wildlife of the proposed spraying. The Final EIS should address the question of adverse

15-2 For a detailed explaination of how wildlife and livestock allocations and proper use factors were computed, see Appendix RM-2.

15-3 Wildlife impacts of vegetation treatments are discussed on page 103.

effects of the treatment on birds and terrestrial wildlife, food insects, and other components of the environment.

15-4 The EIS should also point out that use of petroleum-based herbicides constitutes a drain on nonrenewable resources and requires importation of foreign oil.

4. Wells and Pumps.

It is stated (p. 19) that "if an electric motor is used to power the pump, an overhead power line is normally built to the well site. . . ."

We believe that in many cases such power lines are unnecessary. They are a visual disturbance and may require land disturbance for power line construction. They also use energy from nonrenewable sources, as do gas pumps.

Photovoltaic powered pumps have been shown to be feasible in many applications. Further, particularly where there is a substantial distance to the nearest power source, photovoltaic electricity may be cheaper.

15-5 We suggest that pumps use energy from renewable sources (windmills, photovoltaics) to the maximum practical extent, and that the Final EIS discuss this alternative. Energy use for pumps should also be discussed under "Energy Requirements and Conservation Potential" on p. 83.

5. Sheep Trailing and Grazing.

As the Draft EIS notes (p. 92), sheep trailing on high, windswept ridges has resulted in scarring of the landscape and highly visible terracing.

As noted, it may take many years for land to recover from this problem.

We do not believe, however, that this means that the problem should be ignored or that no measures should be taken to promote eventual recovery, and we are disturbed at the apparent lack of any plans to promote recovery.

We are not urging complete elimination of sheep grazing from areas over 10,000 feet, or complete elimination of all sheep grazing (p. 36).

15-6 What we do urge is that BLM take steps to identify areas where the problem is most critical, and to eliminate or reduce grazing in those critical areas to promote their eventual recovery.

15-4 The use of water-based herbicides as an alternative to petroleum based herbicides is discussed on page 83, Energy Requirements and Conservation Potential.

15-5 These are good suggestions. At such time as project planning for AMP development is started, these sources will be seriously considered. Since the number of pumps required is not known at this time, nor are other variables such as depth of well and volume of water desired, it would be misleading to predict energy use for pumps.

15-6 As pointed out in Appendix RM-2, pages 191 and 192, Appendix RM-3, pages 221 and 222, Appendix RM-8, pages 250 and 252, steps have been taken to reduce the impact from sheep trailing through allocation of AUMs, systematic grazing systems, and creation of additional trails to alleviate the concentration of trailing to only a few trails. A rotation sequence on trails would be developed (pages 9 and 23) to insure minimum impact on the allotments.

In addition, BLM should examine the question of whether stock drives could be rerouted to avoid such damaged areas.

In the absence of such measures, we believe that damage in some of the most highly impacted areas may worsen. Certainly, we do not find any basis for the conclusion on p. 92 that "the damage is not expected to worsen."

In any event, BLM should do more than identify the problem. We believe that it is incumbent on BLM to propose a means by which this damaged land will eventually--even if not in our lifetimes--be restored. This proposal should be included in the Final EIS.

6. Grazing Areas.

It is clear, as noted by the DEIS, that presence of large numbers of grazing animals may lead to contamination of streams. Water supplies may be rendered unusable for campers, hikers, hunters, and other recreationists.

It appears that there may be some areas where the amount of pasture in the watershed of a single creek is quite limited. If, for example, there are only 50 acres of suitable grazing land at the head of a drainage, elimination of grazing in that area would have a fairly marginal effect on livestock operators, while having very significant positive effects on water quality.

15-7

We suggest that the boundaries of grazing areas be evaluated for the purpose of identifying areas where some drainages could be closed to grazing without resulting in a major diminution in lands available for grazing.

We realize that BLM may be reluctant to make further reductions in areas allotted to grazing at the same time that livestock operators are being asked to absorb a significant reduction in grazing. Nevertheless, BLM must keep in mind that there are other important uses of the land beyond grazing, and that population increases are resulting in greater demand for such uses.

Therefore, BLM should undertake a very careful review of ways in which minor adjustments in grazing use can provide greater accommodation to wildlife and recreational use.

Very truly yours,

Luke J. Danielson
Counsel

dh

15-7 In the development of the MFP Step II recommendations and the subsequent alternatives assessed in the EIS, the interdisciplinary team looked closely at all recognized opportunities to improve water quality through adjustments in livstock use. In point of fact, the proposed action and alternatives contain elements (including reductions in livestock and wildlife forage allocations, elimination of livestock from some areas, use of certain riparian zones for livstock trailing only, etc.) intended to result in improvement of water quality where specific problems were identified.

Town of Crested Butte

16

P.O. Box 39
Crested Butte, Colorado 81224
—A National Historic District—
Phone: (303)349-5374

June 17, 1980

RECEIVED
JUN 18 '80
B.L.M. Montrose Dist.

Henri Bisson
Bureau of Land Management
Gunnison Basin EIS Project Manager
P.O. Box 1269
Montrose, Colorado 81401

Dear Sir:

The Town of Crested Butte offers comments on the Gunnison Basin Livestock Grazing Draft Environmental Impact Statement. We urge the BLM to consider a lesser degree of cutback in grazing allotments, in light of the impacts of the proposed action on privately owned lands. While we recognize the need to improve range condition in the area, we urge the BLM to consider the environmentally beneficial results of lesser cutbacks to the private lands owned by ranchers.

52

PRIVATE LANDS IMPACTS

16-1 The DEIS, while describing in admirable detail the impacts of the various alternatives on public lands, falls short when it turns to impacts on private lands and the socio-economic impacts on the owners of those lands. Yet there will be serious impacts on private lands, due to the nature of the ranching operations involved. Those operations rely on both public and private lands, and reduction in use of public lands may force ranchers to change their use of their own lands. The change to be feared most is the sale of those privately owned lands which could lead to the removal of those lands from ranching use. This would be a secondary impact of the grazing allotment cutback, but potentially it is the most serious impact of the proposed action. It is an impact ignored in the EIS.

The extent of this impact is difficult to predict. The economic

16-1 See response to comment 7-9.

model used in the DEIS is probably wildly inaccurate,[1] but is also unable to predict the number of ranches that will be forced out of business. But even if unquantified, the nature of the secondary impacts of driving ranchers out of business should be discussed.

The general outlines of those secondary impacts can be imagined. At least in the area around Gunnison and Lake City, land values for purposes of development exceed by many orders of magnitude the value for agricultural production. Land developers and speculators can outbid ranchers for any land put on the market. Developers and speculators may hold the land in agriculture for several years, riding the rising real estate market, but eventually they will seek to subdivide the land. Once the land is subdivided and sold, residences may not be built immediately -- the new owners may continue to hold the land in speculation. But subdivided land in general is broken into too small pieces to be used as ranchland. The improvements maintained while it was in ranching will be allowed to deteriorate. Fences and irrigation ditches will need repair. If the land is irrigated hay meadow, it will lose that luxuriant green that is an important scenic resource in the area. Surrounding ranching operations will be harmed by this degradation on neighboring land. Those impacts on surrounding ranches will be exascerbated when the subdivision does become dotted with residences. Dogs will harass livestock and trespassers leave gates open. Increased traffic on highways will make their use as stock driveways more difficult and expensive. All these impacts will increase the operating costs of surrounding ranches, tending to drive them out of business as well. As the cancer of residential sprawl grows, the scenic resources of the valleys will be destroyed. The beauty of the area has

16-2

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[1] The model depends on coefficients of dependency of ranch income on federal forage. These coefficients were developed through interviews with ranches in the region of southwest Colorado. If there is a low correlation between ranch size and dependency on federal forage, as I suspect there is, these coefficients will be inaccurate. With low correlation there is no guarantee that the coefficients derived by one sample of ranches in this wide region are accurate for this sample of ranching operations in the Gunnison Basin. I would imagine that the sample used to develop the model would not be very representative of the group considered here, because dependency on federal forage must vary widely from ranch to ranch, and from area to area within the region. Although the general economics of different size ranches may vary, I would imagine that classification by size of operation is a bad way to determine dependency on federal forage.

16-3

16-2 The subdivision of private land is regulated by the State of Colorado and the local county government. Any subdivision will have to comply with local requirements, this is not a function of the BLM. Any anticipated impacts from such subdivision will have to be addressed by the developers and/or the local governments.

16-3 The economic computer model was developed at Colorado State University, with participation by the livestock industry. It is available for inspection at the Montrose District Office.

both drawn a large amount of the residents to the area and has been an important factor sustaining the tourist trade.

REACHING ANOTHER COMPROMISE

BLM has designed alternatives that illustrate the different impacts from different approaches to range management. Thus the no grazing alternative is included not because there is any possibility it will be adopted but to show the response of the range without livestock grazing. The optimize grazing alternative is also analytically valuable to show the response of the range to maximum range improvements and continued heavy grazing. All of the alternatives except the proposed action (and the fall rest alternative which varies only slightly) are extreme positions, and each has extreme adverse impacts on either the ranching community or the range. We urge BLM to consider another compromise position besides the MFP/Spring Rest proposal. The MFP/Spring Rest alternative is a compromise which achieves some improvement of range condition and has some adverse economic impact on the ranching community. Obviously there is a continuum of range response, varying with the level of grazing. We urge the BLM to consider another point on the continuum, one which will produce less 16-4 improvement of the range but which will also put less economic pressure on the ranching community. We believe that by careful analysis of the factors affecting range condition, a better compromise could be achieved.

Analyzing the numbers in Appendix V-2, it becomes clear that different types of range respond differently to rest and to treatments. For instance, most of the sagebrush range sites respond to treatment to a much larger degree than to rest. In the Ory Mountain Loam Sites which comprise the greatest acreage of sagebrush vegetation, the Optimize Livestock Grazing Alternative actually achieves the highest production per acre of all alternatives. This would suggest that treatment of this area will significantly improve the range and that longterm cutbacks in grazing levels here are unneeded. (Of course some temporary cutbacks to rest the land for a few years after treatment are necessary to achieve this response.) On the other hand meadow and riparian areas, represented by the Subalpine Loam Sites and the Mountain Meadow Range Sites, show such a dramatic improvement under the proposed action (or its Fall Rest variant) that this clearly is a proper range management strategy for these areas. It is true that, judging by Appendix V-4, many allotments contain a mixture of range sites, but many allotments do not, and many allotments contain a mix that could be treated with a similar strategy. By careful analysis of which 16-5 allotments can be largely improved with treatment and without longterm cutbacks, I believe the BLM can reduce the economic hardship on the ranching community. An across-the-board strategy, such as the proposed action,

16-4 See response to comment 9-9.

16-5 "An across-the-board cutback management strategy" would be a easy method of management, however, this was not used in developing the Proposed Action analyzed in the EIS. See response to comment 7-19. The land use plan analyzed each allotment on an allotment by allotment basis and delt with specific conflicts and opportunities on each allotment.

may seem an easier method of management, but does not reflect the diversity of range sites in the area. Nor does an across-the-board strategy give flexibility to maximize benefits to both the range and the ranching.

CONCLUSION

The BLM has considered a range of alternatives, providing a good analytic framework for considering the impacts on the publicly owned range. But by failing to consider the impacts on private lands, BLM is missing a major issue raised by this Federal action. We ask BLM to consider another compromise alternative, achieving a different balance between improved range condition and adverse economic impact on the ranching community.

Thank you for your attention.

Sincerely yours,

Heather Noble

Heather Noble
Legal Intern

HN/kf

17

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
Rocky Mountain Region
11177 West Eighth Avenue, Box 25127
Lakewood, Colorado 80225

1950

RECEIVED JUN 17 1980

JUN 23 '80

B.L.M. Montrose Dist.

Mr. Henri Bisson
Bureau of Land Management
Gunnison Basin EIS Project Manager
P. O. Box 1269
Montrose, Colorado 81401

Dear Mr. Bisson:

Thank you for the opportunity to review the draft environmental impact statement on the proposed livestock grazing management in the Gunnison Basin and American Flats/Silverton planning units. We have the following comments.

17-1 This is a comprehensive statement involving much work by the BLM. The statement is extremely specific with unit numbers of outputs and impacts for the present situation and alternatives. A range in numbers would be more credible for most units.

Generally, our major concern with the proposed action in the DEIS is coordination with the Forest Service. The President's Environmental Message of August 2, 1979, specificially noted the urgent need for genuine cooperation between the BLM and the Forest Service. There is a need for such coordination in allotment management planning and range improvement as outlined in the proposed action but it is mentioned only at the time when cooperative grazing plans will be
17-2 developed. Coordination should be taking place in earlier steps. The two agencies have many common permittees and contiguous range allotments that provide opportunities to mitigate adverse impacts.

Following are some specific comments:

17-3 Page viii of Summary, Conclusion: There must be other reasons that the MFP/Spring Rest Alternative is the Bureau's proposed action besides being formulated through the BLM planning system. Also, the last sentence leaves three alternatives (spring rest, fall rest, or a combination of the two) as the preferred course of action.

17-4 Page 5, Table 1-1 b. Watering Facilities: Fencing the watering facilities should be considered to enhance some wildlife species.

6200-11 (1/80)

17-1 See page 83, Assumption #10.

17-2 The BLM and Forest Service presently have very good coordination, particularly on grazing issues in the Gunnison Basin involving common permittees. Every effort will be made to continue this coordination.

17-3 See response to comment 15-1.

17-4 Such consideration will be given during the site specific assessment of any such project. Fencing of watering facilities is a standard BLM procedure when resource conditions warrant.

17-5 Pages 1-4, Table 2-4 Proposed Grazing Schedule: These grazing schedules are not very flexible or feasible when allotment pastures logically vary in size and capacity. Also, spring and fall use allotments involving summer use on National Forest lands have no proposed schedules.

17-6 Page 11: Alternative 1 provides for cooperative administration of 11 existing BLM/Forest Service allotments plus an anticipated 33 additional plans. Page 31 - Alternative 2 provides for continuation of 11 cooperative agreements but states "new cooperative agreements would not be initiated" - why? This is at least contrary to Forest Service policy direction and also the President's Environmental Message.

17-7 Page 27 - Paragraph 7: Reads ". . . livestock use should be not greater than 60% of the herbage. . . ." It needs to be pointed out this is a percentage of height and would only be 20-30% by weight. (See page 15 - under utilization.)

17-8 Pages 113-116, Impacts on Economics and Social Conditons: The adverse impacts with associated secondary effects are only lightly addressed in these sections.

17-9 Page 187, Appendix RM-1: The AUM allocations by allotment make it appear that some of the decisions in MFP Step III (described on page 1) have already been made.

17-10 Basically, we agree with the selected alternative. However, extensive coordination with the Forest Service is necessary and should be emphasized. An alternative that may have merit for consideration is one in which entry dates are delayed for ranges that allow livestock use to progress from BLM to National Forest System lands. This would allow spring deferment on both BLM and National Forest System lands. We could then extend our seasons in the fall. This would allow spring deferment as well as fall deferment on BLM ranges. We are certain, however, that this would be strongly opposed by the ranchers. If BLM ranges are in fact in degraded condition, we feel this would lead to the quickest and most complete improvement.

Because most Forest Service allotments in this area are operated on rotational grazing systems, the carbohydrate depletion cycle is not adverse. Although the above-suggested alternative would require close BLM-Forest Service permittee coordination, we feel the coordination is desirable.

Sincerely,

For CRAIG W. RUPP
Regional Forester

17-5 As outlined in the Draft EIS, the grazing schedules were developed to provide maximum flexibility for a grazing system and still meet the minimum rest the plants require to produce both shoot and root development and growth. Both the Spring Rest alternative and the Fall Rest alternative would provide the flexibility for the livestock operator and the rangeland manager to develop an AMP specifically for each individual allotment and allow the flexibility to modify the AMP, if needed, as future studies and monitoring are evaluated. Tables 2-3 and 2-6 show the expected schedules for allotment involving range users who graze on National Forest Systems Lands. See errata sheet for a clearer explaination of the spring and fall rest schedules.

17-6 Under the No Action Alternative, page 31, BLM is prohibited from implementing any change in present rangeland management. Existing allotment management plans and/or cooperative administrative agreements would continue, however, new agreements or management plans could not be developed. We agree that it is contrary to current Bureau policy and the President's Environmental Message.

17-7 See text change indicated on errata sheet.

17-8 See response to comment 7-9.

17-9 The AUM recommendations were made on an allotment basis during MFP Step II in order to provide an accurate base for impact analysis. As noted in Chapter 1, these are recommendations, not decisions, final decisions will not be made until the EIS process is completed. See response to comment 9-9.

17-10 Since the DEIS for the Gunnison Basin has been printed and released for comment, numerous comments emphasized the impact the proposed action would have due to lack of spring range. Meetings with the Colorado Cattlemens Association, Colorado State University professors (Dr. C. Wayne Cook, Dr. Robert Hyde, and Dr. Larry Rittenhouse) and several professional range specialists have reinforced this need for spring range. A feasible mitigation to this impact would be to develop several (6-9) seeded pastures (totaling 3,000-6,000 acres) of crested wheatgrass or its equivalent as a specific area with specific objectives for enhancement of spring livestock forage. The pastures would be systematically rotated to include range users that hold the grazing privileges on these pastures and range users within commuting distance of the pastures. When adjacent range users were grazing on the seeded pastures, their allotments would be rested for the critical spring grazing season (5/1-6/15). After 6/15 or whenever phenological requirements in the seeded pastures depict optimum grazing has occurred, range users would return to their respective allotments or pastures and continue grazing as outlined in the proposed action. The objective of the seeded pastures would be to develop spring grazing use areas to be grazed by livestock while other allotments within the EIS area were rested so that these rested allotments would improve in a shorter period than the schedule depicts in the proposed action. The minimum rest standard imposed would be 1:2 (rest one year for two years grazed, from 5/1 to 6/15). For grazing after 6/16, a rest standard would not be imposed (i.e., grazing could occur year after year without a required rest if utilization was below the recommended level). A site specific environmental assessment will be tiered to this EIS to assess the impacts of those land treatments and the rest schedule to accompany them.

CSU 18

Colorado State University
Fort Collins, Colorado
80523

Department of Range Science

June 19, 1980

Mr. Henri Bisson
Bureau of Land Management
Gunnison Basin EIS Project
Manager
P. O. Box 1269
Montrose, CO 81401

Oear Mr. Bisson:

I have reviewed portions of your draft EIS concerning proposed domestic livestock grazing management program in the Gunnison Basin Resource Area and Silverthorne Planning Unit. After reviewing these materials, I still believe that your second alternative for a fall rest would be better for the vegetation resource and would probably fit into the livestock operations of ranchers in the area more than would alternative one (spring rest). It is my opinion that there is not enough research evidence to indicate that spring rest is more beneficial than a late summer rest for numerous range species. Certainly, however, soil compaction must also be considered as well as other resources.

18-1 It also appeared to me that decisions to increase wildlife production were also made before these grazing alternatives were ever considered. Is this really the most beneficial decision for citizens of the area, the State and the nation? Oo the costs associated with the benefits of increased wildlife production compare favorably with the benefits derived? Possibly more attention should be given to this in the final statement.

I thank you for the opportunity of reviewing your draft.

Sincerely,

M. J. Trlica
Associate Professor

MJT:mw

18-1 See response to comment 17-9.

National Council of Public Land Users

19

P. O. Box 811
Grand Junction, Colorado 81501

Paul Maxwell, President — Herbert Snyder, Secretary

17 Jun 80

RECEIVED
JUN 27 '80
BLM Montrose Dist.

Mr. Henri Bisson
EIS Project Manager
P.O. Box 1269
Montrose, CO 81401

Dear Sir:

Thank you for the Draft of Gunnison Basin Livestock Grazing Environmental Impact Statement.

It is requested that under Chapter 3, Effected Environmsnt, Economics, that the following information be included. This information is considered absolutely essential to analyze multiple use costs vs. benefits.

WHAT ARE THE ANNUAL COSTS OF:

19-1 | 1. Administering the grazing program? $_____

19-2 | 2. Loss of non-replaceable topsoil from erosion of the watersheds? $_____

19-3 | 3. Topsoil being deposited in expensive water reservoirs? $_____

19-4 | 4. Treating polluted water from the watersheds for domestic use? $_____

19-5 | 5. Irrigating with high saline water from overgrazed watersheds? $_____

19-6 | 6. Elimination of wildlife supposedly competing for food? $_____

19-7 | 7. Damage to fish resulting from polluted water? $_____

19-8 | 8. Damage to all aquatic life due to unstable stream flow resulting from flooding and drouth? $_____

19-9 | 9. Farmers having to compete with grazing on BLM lands at $2.50 an AUM? (This compares with baled hay at about eight (8) cents a bale). $_____

19-10 | 10. Lost precipitation resulting from solar thermals from reflected bare ground in an environmsnt where the annual precipitation is several times lese than the natural evaporation? $_____

Yours truly,
Herbert Snyder, Secretary

Copy to: Natural Resources Defense Council

19-1 The cost to administer the grazing program under any of the alternatives is listed on Table 2-9, page 40.

19-2 The erosion rates under the various alternatives would all be fairly low, the costs associated with such erosion are not quantifiable.

19-3 According to the Water and Power Resources Service, erosion rates in the Gunnison Basin are so low that they are not figured into the cost of reservoir effective life.

19-4 Livestock grazing use is restricted in domestic watershed areas, therefore, this is not a problem in the Basin.

19-5 As noted in the document, salinity levels in the Gunnison Basin are very low. Therefore, the costs of changes in salinity levels are not quantifiable.

19-6 See response to comment 5-4.

19-7 This was not predicted to be a problem in the area (see Impacts on Aquatic Wildlife).

19-8 See response to comment 19-7.

19-9 The assessment of the price paid for an AUM of grazing on BLM administered land is beyond the scope of this EIS.

19-10 Since the proposed rangeland improvements would disturb only a small acreage at any given time, there should be no measurable effect on precipitation.

20

Wilderness Workshop
of the Colorado Open Space Council

2239 East Colfax Avenue, Denver, Colorado 80206 • (303) 320-WILD

RECEIVED
JUN 25 '80
B.L.M. Montrose Dist.

June 15, 1980

Henri Bisson
EIS Project Manager
P.O. Box 1269
Montrose, CO. 81401

Dear Sir,

I am commenting on the Gunnison Basin Grazing Draft Environmental Impact Statement (DES) for the Wilderness Workshop of the Colorado Open Space Council, Colorado's statewide Wilderness organization.

I would like to make the following comments on the DES:

1) We agree with BLM that the area has been overgrazed in the past, and that reductions of grazing pressure in the short term will result in higher quality range in the long term, with less erosion of soil, cleaner streams, and more forage for wildlife and cattle and sheep.

20-1 2) We are concerned with all of the proposed developements in the areas proposed for Wilderness Study Area status. Pipelines,and vegetative manipulations should not be undertaken in proposed WSAs, as they could prejudice future Wilderness consideration by BLM and Congress.

Also, great care should be taken to evaluate all grazing developments with an eye to their compatibility, singly or cumulatively, with eventual Wilderness designation. Stockponds, spring developments, and fences could have a great impact together that they might not each have if taken separately.

Sincerely,

Norm Mullen

Norm Mullen

60

20-1 See response to comment 6-5.

21

STATE OF COLORADO
Richard D. Lamm, Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
Jack R. Grieb, Director
6060 Broadway
Denver, Colorado 80216 (825-1192)

June 30, 1980
2300 S. Townsend
Montrose, CO 81401

RECEIVED
JUN 30 '80
B.L.M. Montrose Dist.

Mr. Henri Bisson
Bureau of Land Management
P. O. Box 1269
Montrose, Colorado 81401

Dear Henri:

Our Division has reviewed the Gunnison Basin Grazing Draft EIS. Overall, we feel the document is excellent, and we commend BLM for the outstanding job accomplished. We did find the document complex and well thought out in most respects. Because of the complexity of the document, it would have been nice to have had another month to review and analyze it. In any event, we offer the following comments and look forward to future coordination in developing the final draft and a workable management plan.

In analyzing the alternatives, our Division would obviously most strongly support option #5 - Optimize Wildlife and Watershed Values. We do realize the significance of multiple use, however, and we can and do support BLM's proposed alternative for spring rest rotation. If carried out as proposed, we feel the spring rest alternative does present viable solutions for increasing long-term forage for wildlife, while improving overall range conditions. The fall rest rotation alternative would be our third choice.

Considering the dramatic changes expected to occur in the Gunnison Basin from major mining activity and increased growth, the grazing EIS is very timely. BLM lands represent a large portion of the bread and butter winter ranges for big game herds in the Gunnison Basin. Big game herds spend the critical winter months on only 10 percent of the land area in the Basin. Approximately 50 percent of the critical winter range is controlled by BLM, while the other 50 percent is private. As private lands continue to develop as growth continues in the Gunnison area, the BLM winter ranges become more crucial to big game, necessitating the need for better range management.

Land use regulations in Gunnison County are making the BLM lands even more important as land use planning is being adamantly opposed by private landowners. We realize the need for improved range conditions as outlined by some of the statements in the document; i.e.:

- page 50 - (Existing vegetation conditions) - 86% of EIS lands are in a poor or fair condition.
- page 59 - (Erosion condition) - 70% of the lands are in a moderate or critically severe condition class.
- page 63 and 69 - (Riparian areas) - one-half of these areas need improvement.

From these statements, it is obvious that improved management is needed. The spring rest alternative and livestock reduction program should help alleviate the outlined problems. Our Division is committed to help meet BLM range condition goals as documented by our elk harvest management goals outlined for 1980 in units 54 and 55.

Some of the areas in the Draft which we feel deserve special attention include:

21-1

1. Sagebrush treatment. Sagebrush is the one single key to winter survival of deer and elk during a bad winter. Heavy snows cover most grasses and forbs, leaving the taller sagebrush plants as the dominant forage available. Winter ranges in the Gunnison Basin are dominated by sagebrush. Our Division opposes herbicidal spraying of sagebrush on south-southwest facing slopes below 9,000 feet. Sage grouse also depend heavily on sagebrush for their livelihood. Historically, thousands of acres of sage grouse habitat has been destroyed by aerial spraying of sagebrush. Our Division does feel that spraying could be done on north and east facing slopes, which are not critical for big game winter range. In these areas, if spraying is done, we would recommend that it be done in a random patchwork fashion so that expanses of sagebrush are left.

21-2 We are also concerned about spraying in wetland and riparian areas. Discussion of buffer zones on page 16 recommends 75 feet on each side of the drainage. This distance is simply not adequate in most cases. Appendix F-5 is much more realistic and should be closely followed. In many instances, we would recommend a 300 foot (each side) buffer zone. Riparian areas represent the richest floral and faunal zones in Colorado and are of key importance to wildlife. The Gunnison Basin possesses some of the highest quality fisheries in Colorado. The riparian areas represent the key to water quality, streambank stability and fisheries habitat.

21-3 Fencing of riparian areas is the best kind of stream improvement possible. We strongly support any form of riparian fencing proposed. Fencing and spraying in riparian areas is critical, and we would like to have the opportunity to discuss these proposals on a case by case basis.

21-4 As a final note on sagebrush spraying, it might be significant to question whether the Division's publication on interagency sagebrush control guidelines has been considered. This document will cover most of our concerns regarding sagebrush control and sage grouse habitat.

Page 19 discusses stock tanks. We have strong reservations concerning development of new or existing stock tanks in key winter range areas. We feel it would be more appropriate to manage the lower elevations for wildlife winter range, while managing the higher elevations more intensely for livestock.

21-5 Page 36 outlines public input for eliminating elk use in the area surrounding Gunnison. Our Division has dramatically increased antlerless licenses for the Gunnison area for this coming fall as a compromise with the livestock industry and BLM. It is totally unrealistic to consider eliminating the elk herd surrounding Gunnison. As more ranches are converted to municipal and domestic uses, public lands will become more critical for wildlife. Managing these lower elevation public lands in key winter range areas should be strongly considered.

21-1 As noted on page 18 of the EIS (design feature #1), the Colorado Division of Wildlife would be requested to accompany the BLM on field examination prior to any vegetation treatment, and design features will be modified in accordance with the 1975 Memorandum of Understanding between BLM and DOW. The sagebrush treatment described in the Oraft EIS essentially conforms to the guidelines in this comment. The coordination with the Oivision for any such treatments will be an important part of the implementation process.

21-2 See text change indicated on errata sheet (comment 6-1).

21-3 See response to comment 21-1. The DOW would also have input into any site specific environmental assessment done for a fencing project that would affect wildlife.

21-4 See response to comment 21-1.

21-5 The alternative of eliminating elk use around Gunnison was presented during the EIS scoping process and therefore must be mentioned. However, it was eliminated from detailed study because of its impracticality.

21-6 Currently, domestic sheep grazing in the American Flats area is competing directly with bighorn sheep. The intensity of this livestock grazing should be seriously considered as related to bighorn sheep habitat management and discussed in the final EIS.

21-7 Pages 78-81 discuss economic values of wildlife and livestock. The Draft does not use a multiplier for recreation and hunting as compared to the 1.8 multiplier factor used for the livestock industry. Recent figures by a local outdoor writer lists revenue totalling $38 million for elk harvested in five Gunnison Basin game management units for 1978. It is important that more realistic economic values for wildlife in the Gunnison Basin be considered and presented in the final EIS.

21-8 Page 100 contradicts page 63 in the discussion of concentrations of wildlife using winter range with no livestock grazing. Page 63 states that the Sapinero Management Area is heavily grazed by deer and elk during winter months and shows an upward vegetative trend. Page 100 states that without livestock grazing big game herds will need to be reduced to provide ample range. Some clarification on this point would be a good idea.

21-9 Page 104, paragraph one, should be reworded to state: "Livestock grazing does adversely impact the aquatic/riparian etc." and "adverse impacts do reduce cover, etc."

Numerous Forest Service and BLM studies have proven that livestock grazing is among the most detrimental forces impacting riparian areas and fisheries habitat. It is a well known, proven fact and should be stated as such. Bruce Smith, BLM, Rock Springs, Wyoming and Bill Platts, Forest Service, Idaho, have prepared numerous presentations on this subject.

In conclusion, our Division supports the Draft Gunnison Grazing EIS. We feel there is sufficient forage for both wildlife and domestic livestock if proper range management is exercised. We support BLM's efforts and once again commend you on the efforts put into this fine document.

Best regards,

Rick Sherman

Rick Sherman
Wildlife Biologist

RS:mg

cc: J. Houston
B. Clark

21-6 As described in the response to comment 5-3, competition between domestic sheep and native bighorn sheep was examined by the interdisciplinary team and is assessed in this EIS.

21-7 Both the wildlife and livestock values were generated from studies done by Colorado State University. Also see Assumption #10, page 83, Draft EIS and responses to comment letters 3 and 5.

21-8 The statement on page 63 refers to the Sapinero Management Area only; the statements on page 100 refer to other areas in the Gunnison Basin.

21-9 The specific use of the words "may" on page 104 in paragraph one is justified, because the degree of impact if any would depend on and vary considerably with the grazing system that is ultimately initiated, the treatments decided upon for a given allotment, and other decisions that will be made subsequent to this EIS.

RAY KOGOVSEK
3RD DISTRICT, COLORADO

501 CANNON HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515
(202) 225-4761

COMMITTEES:
EDUCATION AND LABOR
INTERIOR AND INSULAR AFFAIRS

22

DISTRICT OFFICES:
PLEASE REPLY TO:
☐ UNITED BANK BUILDING
201 WEST 8TH STREET, ROOM 425
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(303) 544-5277, EXT. 313
☐ 2860 SOUTH CIRCLE DRIVE
COLORADO SPRINGS, COLORADO 80906
(303) 576-5596

2442

Congress of the United States
House of Representatives
Washington, D.C. 20515

August 12, 1980

FD: 8/29

Mr. Bill Luscher
State Director
Bureau of Land Management
Colorado State Office
1600 Broadway
Denver, Colorado 80802

Dear Mr. Luscher:

Serious concerns have been raised with respect to present preliminary EIS proposals of the Bureau of Land Management regarding the management of livestock grazing on public lands in the Gunnison Basin area. I have had numerous contacts with the Gunnison area ranchers and permittees and share their concern that unless these management proposals are significantly modified, the adverse affect upon them will be such that the stability of the ranching industry will be jeopardized. The implementation of actions which cause immediate and serious hardship to an already beleaguered agricultural community in the Gunnison Basin cannot be made acceptable merely on the assumption of a possible salutory effect on productivity, given twenty years time. Livestock AUM cuts averaging 26 percent but ranging to more than 50 percent, and in a few cases, eliminated altogether, would have irreparable consequences to the existing grazers. It is important to remember that more than 120 livestock operators, and many more families, rely on these public lands as part of their confusion inasmuch as wildlife AUMs are not proposed for reductions comparable to those of domestic livestock, though elk herds in the area have increased significantly in the last several years and may even be responsible for overgrazing on some allotments.

22-1

22-2

22-3

22-4

Despite the extreme budgetary constraints of the federal government, significant funds for range improvement on these public lands have been appropriated. These funds will enable spring and well water development. This can do much to insure better livestock distribution on allotments, which is very important to improved forage. Other measures such as plowing and reseeding, as well as various vegetation treatment actions can have a marked effect. Extensive fencing of riparian areas may likely prove to be unduely problematical to permittees as well as ineffective, since a significant part of the damage is attributed to wildlife, particularly elk.

22-5

22-1 The BLM wishes to thank Representative Kogovsek for taking the time to review the EIS on the proposed livestock grazing program in the Gunnison Basin Resource Area, and discussing the proposed program with area ranchers. One of the main goals of the planning/scoping/EIS effort is to involve all interested parties in the decision making process. In view of this concept, we will continue to work closely with livestock operators in the Gunnison area in order to develop more productive rangelands. Your specific concerns have been addressed in the Final EIS as follows:

22-2 As noted in response to comment 9-9, the final decision on rangeland managment in the area could be a combination of alternatives, which would allow added flexibility to the development of the Allotment Management Plans.

22-3 We share your concerns for the welfare of the ranching industry. Throughout the EIS we have outlined the projected impacts of the alternatives on ranch operations and incomes. Also, the proposed rest schedule has been designed to be flexible so that the range manager and permittee can work together to develop an AMP that will enhance the vegetative resource while fit the permittees operation. As noted in the response to comment 7-14, the best data and literature available were used to predict vegetation responses to various programs.

22-4 The Colorado Oivision of Wildlife has coordinated with BLM in arriving at reductions in wildlife numbers. As noted in the response to comment 10-5, reductions in elk numbers are proposed in certain high use game management units.

22-5 A special riparian pasture rest schedule has been proposed in some designated areas. However, no extensive fencing of riparian areas has been proposed.

22-6 I am not aware of any adequate explanation given the flexible implementation of appropriate range improvement measures while maintaining livestock AUMs approximate to present levels. As we move toward a decision document I would hope that such an alternative is now under consideration.

I am very much aware that you have taken a personal interest in proposals contained in the Draft EIS of the basin grazing management plan and have met with permittees, as well as toured allottments. I commend you for the responsiveness you have thus far demonstrated and for your agency's efforts at every level, to assure adequate opportunity for public input and comment. I am nevertheless concerned that due consideration now be given to the important information that was acquired during the initial response period from the

22-7 rancher-permittees. The testimony of those permittees who are, after all, in every way most familiar with these allottments, must be accorded proper recognition.

We all realize that due to the soil composition, climatic conditions, and other factors, spring forage in the Gunnison Basin is inherently less than ideal. However, as you know, it has been adequate for the BLM grazing to play a key part in the traditional integrated ranching operations of the area. Alternative early pasture is simply not available. If cattle are not brought out of the meadowlands in spring to allow for the natural hay to mature, ranchers will lose their crop, and thus, the winter feed necessary for cattle during hard winters. It is apparent that many aspects of the Spring Rest proposals

22-8 are incompatible with the type of ranching operation necessary in this area of Colorado, and that any restriction in grazing will injure many operators. Above all, a significant amount of flexibility is required of any management plan to be implemented.

I hope that you will continue to give the disposition of the Gunnison Basin grazing plan your personal attention as it proceeds on to the decision document stage and then to final decisions on individual allottments and implementation. With sound management and the improvements funded by Congress, we all look forward to improved and more productive public grazing lands in the Gunnison Basin. I trust that alternatives and actions will be selected so that the range livestock industry in the area will be given the opportunity to

22-9 work closely with the BLM to implement needed range improvements in an effort to bring about desired changes in vegetation without significant reductions of livestock or wildlife grazing. I am confident this can be accomplished and that all parties concerned will benefit.

Sincerely,

Ray Kogovsek

RAY KOGOVSEK
Member of Congress

RK:ml
cc: Dave Rice
Warren Comerer
Joe Vader
Boards of County Commissioners
(Gunnison, Montrose & Hinsdale)

22-6 The Optimize Livestock Grazing Alternative assessed in the Draft EIS proposes a slight short-term increase (2 percent above present licensed allocations) in livestock allocations, as well as a variety of rangeland improvements. This alternative was developed in the planning process and assessed in the Draft EIS. This, as well as all alternatives assessed in the EIS, will be given consideration prior to making the final decision.

22-7 As noted in the Consultation and Coordination secion of the Final EIS, the planning/scoping/EIS process has been an effort of several years, with many opportunities for input and review by interested parties. All substantive comments received on the proposed rangeland program are included in the Final EIS, and responses given.

22-8 In response to concerns over spring range, a possible mitigation for enhancement of some early spring use has been developed (see response to comment 17-1D). Also, as noted above, and in the Summary, the proposed action and EIS were designed to allow management, in conjunction with the livestock operators, a needed flexibility to implement a sound allotment management plan which would minimize adverse impacts.

22-9 By way of conclusion, the BLM again thanks Representative Kogovsek for his attention, and shares his concern for the well being of the livestock industry in the Gunnison Basin. We sincerely hope that through the cooperation and efforts of the BLM, permittees, and other interested parties, the public rangelands will be improved to the benefit of all.

COMMENTS FROM PUBLIC HEARINGS

The order of speakers at the public hearings follows:

May 19, 1980
Montrose, Colorado

Speaker	Representing
Robert M. Hyde	Self-College Extension Range Specialist
Jim Kuziak*	Gunnison County Planning Commission

Tuesday, May 20, 1980
Lake City, Colorado

Speaker	Representing
Verna Carl*	Self
Purvis Vickers*	Self-Rancher
Bud McDonald*	Self-Rancher
Stan Smock	Self-Rancher
Lowell Swanson	Self-County Assessor
Bob Whinnery	Self-Rancher
John Parker	Self-Gateway Ranch
Helen Winnery*	Self-Rancher
Bill Hallow	Self
Cindy Smock	Self-Rancher
Irene Weems*	Self
Robert Edmondson*	Self-Rancher

Wednesday, May 21, 1980
Gunnison, Colorado

Speaker	Representing
Lawrence Phelps	Colorado Cattlemen's Association
Gilbert Kysar	Self-Rancher
Joe Youmans	Self-Rancher
Bob Irby	Gunnison County Stockgrowers Association
Vernon Harris*	Self-Rancher
Glenn Sammons	Self-Rancher
George Gehrke	Sportsman
Kenneth Ochs	Ochs Brothers Ranch
Rudy Rudibaugh*	Self-Rancher
Norma Swanson	Self

*No response made by BLM. Only the comments which required a response have comments printed in this EIS. Complete transcripts of the public hearings are available for review at the Montrose District Office.

MONTROSE

The following are portions of spoken comments presented at the public hearing conducted in Montrose, Colorado, May 19, 1980. Only those portions which required a response were reprinted along with the response from BLM.

Robert M. Hyde

M-1 Part of the problem may have occurred when only one of the 12 members of the EIS team were range trained, and none were trained in animal sciences. Range livestock aspects are sufficiently important in the Gunnison Basin EIS to warrant a greater percentage of the total team effort than they were. This in itself may have been tolerable except the non-agricultural interests obviously overrode the range interests on many occasions.

Comment	Response
M-1	The Council on Environmental Quality regulations require an interdisiplinary team be used to prepare all EISs. The team as selected represents a well balanced complement of all resources. Even though only one of the twelve members of the actual EIS team was range trained, the Gunnison Basin and American Flats/Silverton URAs and MFPs were prepared with the assistance of four range conservationists, having a total 40 years of experience. This EIS was based on recommendations developed by these range conservationists and other resource specialists equally qualified in their disciplines. In addition, the URAs, MFPs, and the Draft EIS were reviewed by range conservationists in the BLM, Colorado State Office and Washington Office. In fact, the proposed rest schedules were reviewed by professors of range science at five Western universities, and their comments were used in deriving the final schedules.

M-2 Page 9, "Proposed Action, with fall rest..." should probably have read, "with spring rest."

M-3 Page 15, Trilica..." There was an extra "i" before the "l". It should be Trlica.

M-4 And, "...sagebrush composition..." should have read "competition."

M-5 I see no basis for the criteria of determining key species. Key species designates are affected by slope, exposure, elevation, soil development, precipitation, and related factors-- not game range, fisheries, and the other factors listed.

M-6 Page 16 should be "(Kearl)" instead of whatever was listed.

M-7 Sagebrush should be sprayed at its period of maximum growth and success of spraying is closely tied to proper application timing. I would use the butylester formulation of 2,4-D where there was no risk of damaging nearby crops because of better control possibilities and lower cost.

M-8 On page 17 ...two bottom moulboard plow... is more acceptable than the way it was stated.

M-9 Also, page 17, chaining has frequently been demonstrated to be more effective than only the two to six years stated in the EIS, depending on the species being chained.

M-10 Page 19, the area disturbed by 39 miles of pipeline should be 4.7 acres not 14 acres.

M-11 Page 19, hand labor should be minimized in trail development or improvement except in wilderness areas, and even here there are some differences in interpretation of intent. Why not use the most effective legal means of trail improvements?

M-12 Page 24 and 25, Tables 2-6 and 2-7 could be depicted in a clearer manner.

M-13 Page 27, "Trlica" is correct, but was again misspelled.

M-14 There are so many variations associated with the statement, "Defoliation early in the growing season is less likely to reduce carbohydrate storage in grasses than late season defoliation." That should be qualified.

M-15 Page 32. How are AUM's allocable? "For enhancement of other resources." I assume for visual enrichment. And how can this be justified to both ranchers and the general public if continued grazing would not harm the environment?

M-16 Page 34. Why was the alternative to optimize livestock grazing considered when the possible alternative of manipulating current permitted use with significant range improvement was not specified in view of economic and public use considerations?

M-17 Page 47 of the statement. "Mountain Meadow range site corresponds with the riparian zone, since both areas are naturally subirrigated." This is in error because the former is the stable community while the latter is one of the most unstable. Vegetation may be similar, but site characteristics are very different.

M-18 Page 50 indicates that 14 percent of the range sites are in good condition, 47 percent fair, and 39 percent poor condition based on SCS designated range sites. However, in reviewing my SCS range site descriptions for the resource area I find only Number 228 Mountain Loam; 245 Mountain Swale, 251 Shallow Subalpine Loam, and Number 307 Alpine Slopes as occurring in the area of Gunnison SCS field office of the 9 sites listed by the BLM as occurring on the resource area. Granted this system has not been used extensively on higher elevation range land after it was developed in Texas in 1948, but this may be a key to the low percentage of good condition range designated in the BLM inventory.

M-19 Page 61. "Animal grazing causes soil compaction by trampling and a reduction in the vegetation canopy." This is not necessarily true and should be striken from the EIS.

M-20 Page 62. Not all big game ungulates compete with domestic livestock for vegetation. In fact, elk are the only ones of the 5 species which may compete significantly. Mountain goats compete the least. These kinds of comments don't belong in a factual EIS.

M-21 Page 61 indicates 121 livestock operators depending on public land while page 78 indicates 125. Which is correct?

M-22 Page 73. "...cows are bred to calf..." C-A-L-F should be spelled C-A-L-V-E.

M-2 See text change indicated on errata sheet.

M-3 See text change indicated on errata sheet.

M-4 The text is correct as written.

M-5 Key species are selected by using criteria of both physical requirements of the plants and for the management objectives of the management plan.

M-6 See text change indicated on errata sheet.

M-7 As noted in the text, the most effective spray formulation would be used, subject to site specific environmental restraints and EPA and BLM guidelines.

M-8 See text change indicated on errata sheet.

M-9 The EIS was written on a "worst case" basis. Therefore, in terms of rangeland improvements, the minimum effective life of a project was used for impact analysis purposes. As Dr. Hyde notes, the effectiveness of some treatments could be greater under better conditions.

M-10 Text is correct as written. The area of disturbance on pipeline construction includes the width of the trench plus any related disturbance.

M-11 The most effective means of trail improvement would be used with regard to not only legal constraints but with regard to environmental impacts and cost.

M-12 See text change indicated on errata sheet.

M-13 See text change indicated on errata sheet.

M-14 The literature cited following the general research statement may be consulted for qualifications.

M-15 See response to comment 5-3.

M-16 The alternatives selected for analysis were developed throughout (1) the planning process, (2) public involvement and scoping meetings, and (3) legal mandates of National Environmental Policy Act, and the National Resources Defense Council court suit on BLM grazing. The Optimize Livestock Grazing Alternative (page 34, Draft EIS) would allocate short-term livestock use at 61,356 AUMs (a 2 percent increase over present licensed use). Vegetation manipulation on 201,955 acres and other rangeland improvements are also proposed.

M-17 Both areas are subirrigated and have similar present vegetation. Therefore, for allocation and impact analysis purposes, the anticiapted impacts would be similar.

M-18 The descriptions and locations of the nine range sites listed in the EIS were taken from recent published mapping work provided to BLM by the SCS District Conservationist in Gunnison.

M-19 The statement was made in general terms in order to explain general grazing effects on water infiltration. The cause and effect of grazing and soil compaction are well documented throughout the scientific community.

M-20 As written in the EIS, the statement was intended to mean that the big game ungulates compete to varying degrees with domestic livestock for vegetation, while smaller wildlife species are generally not in direct competition.

M-21 See text change indicated on errata sheet for page 69.

M-22 See text change indicated on errata sheet.

Comment	Response
M-23 Page 75. Apparently, landscape architects use very different terminology than do plant ecologists, because I don't understand form, line, color and texture regarding vegetation. This section should be rewritten to conform with terminology in existence long before landscape architecture was known. How are visual resources managed? Are very many classes representative of the overall existing quality of the environment?	M-23 The visual resources section was written in accordance with the BLM VRM system and accepted principles of landscape architecture. See appendix VRM-1.
M-24 Page 75. "279,063 years" should probably be changed to 279,063 days.	M-24 We cannot find the referenced number on page 75; the second column, last full paragraph refers to, "279,000 skiers", and is correct in the text.
M-25 Figure 4-2, although not referred to in the text, can be considered only as geologic slippage and in no sense should be related to either livestock or big game trailing.	M-25 Figure 4-2 is referred to on page 92. This reference merely points out how livestock trails, mainly sheep, can help to accelerate the geologic and climatic processes. It also states that with the elimination of livestock trailing very little recovery would be expected.
M-26 Are the various alternatives feasible? This question is asked because of the wide range of AUM's ranging from 57,983 for wildlife with Alternative 4 being eliminated livestock to 78,742 AUM's in Alternative 1 Spring Rest, 2 Fall Rest, 5 Optimize Wildlife and Watershed, and 6 Optimize Livestock, Alternative 3 Continue Present Management Allotments. 60,013 AUM's for livestock and 36,141 for wildlife totaling 96,154 AUM's--this use reported as resulting in a downward trend on much of the resource area. Which of the other alternatives, however, states that the projected AUM's for both livestock and wildlife in 20 years is greater than the proposed action in the short term?	M-26 Under NEPA and the CEQ regulations, agencies must consider all "reasonable" alternatives. See Appendix RM-2 (page 195) for methodology used in vegetation allocations. The parameters set forth in the No Action Alternative prohibit making any change in management, in this case livestock changes, in the short or long term. With the same level of livestock use permitted in the long-term, a degredation of other resource values would occur (see Table 2-9). This alternative is feasible, however, the environmental cost in the long term needs to be considered.

LAKE CITY

The following are portions of spoken comments presented at the public hearing conducted in Lake City, Colorado, May 20, 1980. Only those portions which required a response were reprinted along with the response from BLM.

Stan Smock

LC-1 The EIS Draft now plans to cut my allotment from 1,550 to 800. This is Allotment Number 6103. I've already taken a reduction from a 1,550 to 1,350 because I felt that in a particular pasture that that was appropriate, but I don't really see any justification for assuming that we need to go down to 800. I don't think that there is any real scientific data to back up this assumption.	LC-1 See response to comment 7-1.

Lowell Swanson

LC-2 Now, on Henson Creek I saw a document by BLM here within about the last 4 or 5 months, and it said that BLM was going to withold grazing permits up Henson Creek from Lake City, because they feared the parasite Giardia Lamblia, and the parasite has never been identified in the water system of the Lake City Water and Sanitation District since I have been associated with the district. And that started in 1967. But they're going to withhold grazing up Hanson Creek because they're worried about the bug.	LC-2 This is not proposed in the EIS.

Bob Whinnery

LC-3 My first understanding of this is that this--I'm speaking from a rancher's standpoint--this study was made primarily in 1977 for the range impact. It was made in the driest year that we had in the state of Colorado for 30 years, and, of course, even the meadows--I had 2 ranches that I never hayed because I didn't have any water on them in 1977.	LC-3 See response to comment 7-1.

John Parker

LC-4 When your two whiz hotshots came up there they said that they were going up to the head of Trout Creek to shock the fish. And I said that there was no fish up there because the winter before there was no snow and the water froze and the water went out of the channels and everything else. I said that if you would go down about a mile from where Warm Springs is, and anywhere from Warm Springs or Trout Creek--from Warm Springs on down there is all kinds of fish. But no, they wouldn't do that. So all through your study it says, "No." So then, I am sure that that is one of the criteria used to put Trout Creek's condition as a riparian habitat as from poor to fair.	LC-4 See response to comments 7-1 and 13-4.

Cindy Smock

LC-5 In 1977 they started this scientific study that was supposed to help determine whether or not our range, as a result of all the efforts we have been making, is getting better or getting worse or staying the same. They said they would be coming back at the end of the first cycle to, you know, to make this before and after type, you know, to collect this before and after data. And the cycle hadn't finished yet. And yet they have now suggested that we cut our ranges by more than half of-- Oh, well, by two-thirds of what our AUM's presently are. I am very confused about on what basis they made that suggestion. I feel that it's unfair considering how, you know, that the data isn't in yet that they've encouraged us to take a lot of effort to really help our range and yet they've cut it, at least on paper, based on evidence that hasn't come in yet.	LC-5 See response to comments 7-1 and 10-4.

LC-6 They've taken their first data point in 1977 which is, as Bob Whinnery said, the worst water year in, you know, in 30 years. And we didn't get any hay off of our fields either that year. So that is not only a very bad year to be making the one data point based on, you know, what our range is. But then to not even get the second piece of evidence to determine, you know, what direction it's going seems really unfair to make a dcision as a result of that.	LC-6 See response to comment 7-1.

GUNNISON

The following are portions of spoken comments presented at the public hearing conducted in Gunnison, Colorado, May 21, 1980. Only those portions which required a response were reprinted along with the response from BLM.

Lawrence Phelps

G-1 The proposed action calls for a Spring-Rest period requiring the land to be rested for a period of one to three years from the date it was grazed. The number of years rest to be determined by the actual dates or time of year when it was grazed. My concern with this proposal is how it would be implemented. I feel that it would be impossible to implement this proposal in many cases without working an extreme hardship on the livestock by putting undue stress on them. It is imperative that we consider the condition and means of handling the livestock if a rancher is going to stay in business.	G-1 As explained on page 11, the needs of the key forage plants would first be taken into account in order to meet the objectives of the AMP and land use plan. Secondly, the needs of the range user, wildlife, and other resources would have to be incorporated into the spring rest schedule and a balanced livestock grazing program initiated. Before the AMP is completed the range user would have an active role in developing it so as to minimize impacts to his operation as much as possible.
G-2 I feel that the proposed action would be impossible to implement on many of our allotments and I seriously doubt if this is the way to go. I would urge that a combination of alternatives be considered. An example would be a straight deferred rest rotation system. But, whatever action is eventually taken, I feel the plan must fit the land the AMP is proposed for, and that the handling, moving, and condition of the livestock be a prime concern.	G-2 See response to comment 17-5.
G-3 Condition and apparent trend data gathered in 1978 was a one shot deal taken in not a very good growing year and long term information is lacking on most of the unit. I feel that more data should be compiled on trend, utilization and actual use before any action as drastic as the proposed action be imposed.	G-3 See response to comment 7-1.
G-4 Because a riparian habitat is very unlikely to ever reach an excellent condition due to extreme changes, how can it be actually classified? The point should be made that areas classified as riparian are very valuable to livestock grazing--that is many times where water and the best grazing are available. Without the use of those areas, ranchers would be harmed considerably. While the riparian areas are valuable to livestock for grazing and water purposes, livestock is not a significant cause of changes in the habitat. The primary causes are stream flow and erosion and the high use of these areas by wildlife for winter grazing.	G-4 See pages 66-69 (Draft) for a discussion of classification methods for riparian areas. See also response to comment 13-4.
G-5 Any game population numbers in an area such as ours has got to be determined by the available winter range, and as much of our winter as well as summer range is on private land. We have a real concern about the game population in some areas, as overgrazing by wildlife is evident--much of it on private land.	G-5 See response to comment 7-13.
G-6 I would like to comment on one allotment, this is Number 6104, the Powderhorn AMP, which is in the Powderhorn Primitive Area. I am speaking about this area because of the far reaching effect the proposed action would have on any wilderness or primitive area throughout the state if they are all treated the same as this area has been addressed in this EIS. The proposed action reduces vegetation allocated to livestock from 2,208 AUM's to 1,200 AUM's, or a reduction of 1,008 AUM's. Yet, the AUM's allocated to wildlife is actually increased by 1 AUM. I feel that this is entirely out of proportion, and feel this is being done because this allotment is in a proposed wilderness area.	G-6 As noted in the response to comment 5-3, proposed vegetation allocations, including the proposed allocations in the Powderhorn Primitive Area, were developed based on rangeland condition. Livestock grazing is a compatible use under the Wilderness Act.

Gilbert Kysar

G-7 MFP Spring Rest Alternative Plan. We disagree with the proposal of Spring Rest, because we rest it every year from June 15 until dormancy. We do not graze it during the flowering, seed ripe or seed dissemination period, and we trail graze it in the fall which helps to tramp in the seed.	G-7 The basis for the proposed spring rest schedule is explained in Appendix RM-6 (page 235).
G-8 We feel that wildlife AUM, under present management, are on the increase with no decrease in sight, and nowhere in the draft of the EIS is outlined a plausible, realistic, working relationship between the BLM and the Division of Wildlife even suggested. We feel that if such a coalition were implemented this would open up and reveal actual wildlife, specifically elk usage, not now fully recognized by present BLM policy.	G-8 See response to comment 7-13.
G-9 We would like to point out that of the twelve authors and technicians of the Gunnison Basin Livestock Grazing and Environmental Impact Statement, there was only one Range Conservationist listed. It would seem to us that with a program of these proportions, which are stated in the Impact Statement, that there should have been many more Range Conservationists responsible for livestock grazing instead of only one.	G-9 See response to comments 7-19 and M-1.
G-10 We have no guarantee of range improvements being made in the future on our allotments so as to improve our range to gain back our 31 percent decrease in AUM's. The BLM is not maintaining some of their camp grounds this year because of the economic conditions and gas shortages.	G-10 See response to comments 6-7 and 7-12.

G-11 We feel strongly that the allotment inspection made in 1978 by the range management personnel--the botanists, did not show an average of any kind of water or of plant life. The inspection also was made in the driest year since 1929, so no trend could be established.

G-11 See response to comments 7-1 and 13-4.

G-12 Furthermore, we propose a management plan of improvements and treatments with recognized conservation practices that will enable us to use the land, using present AUM allocations. We feel that in this manner we can tell sooner if the treatments will sustain more grass and provide a stable grazing use that will satisfy management and users.

G-12 See response to comment 9-9.

Joe Youmans

G-13 I personally do not feel that the EIS study concerning the vegetation is very accurate, because it was made during the drought year.

G-13 See response to comment 7-1.

Bob Irby

G-14 The range trend analysis was taken concurrently with range conditions and long-term trend information is apparently lacking in much of the EIS unit.

G-14 See response to comment 7-1.

G-15 An intensive study should be made on riparian areas and their uses and effects on livestock grazing and wildlife. We would suggest that there is probably far more damage to riparian areas by wildlife than livestock as deer and elk tend to hang in these areas causing sloughing of banks along streams and tramping down the willows.

G-15 See response to comment 13-4.

Glen Sammons

G-16 I do hope that you will give serious consideration to the fact that each allotment should be considered individually, because we do not feel any one plan can meet the needs of all allotments.

G-16 Each allotment would be considered individually at such time as allotment management plans were written within the general guidelines of the rest schedule. See response to comment 17-5.

G-17 We would also like for you to seriously consider the method for implementing the Spring-Rest alternative and come up with an alternate proposal that will more adequately represent the intent of the Taylor Grazing Act as it was intended to help the livestock man.

G-17 See response to comment 9-9.

George Gehrke

G-18 Mr. Gehrke's comments are also included in his letter dated May 21, 1980 (Letter #3).

G-18 See response to letter 3.

Kenneth Ochs

G-19 We believe that one of the most logical of all possible alternatives and proposed actions was not included in the draft statement. This alternative would be to continue livestock grazing at present levels and accomplish various rangeland improvements and management changes.

G-19 See response to comment M-16.

G-20 Concerning Alternative 1, MFP Step-2, Spring-Rest as set out in the summary, we believe the initial 26 percent reduction in existing livestock grazing allocations is too great and is based on data whose accuracy is questionable and unproven due to the multiplicity of 167 allotments, lack of data on many of them, differences in allotment locations, elevations, exposures, moisture patterns, wind variations, past historical uses, soil variations, and lack of experience on specific allotments with such Spring-Rest.

G-20 See response to comment 7-1.

G-21 The amount and type of range improvements to be implemented is at best a very hazy estimate. BLM lacks sufficient data to make allotments to make a definitive judgement on range improvements on those allotments. BLM personnel lack personal knowledge of so many large areas of so many allotments that they cannot temper textbook procedures with actual experience on such allotments.

G-21 See response to comment 7-1.

G-22 BLM figures regarding reduction of ranch income under this alternative (Spring Rest) are only estimates, and estimates should be identified as such and rounded where used. An average 26 percent reduction in grazing numbers according to figures listed here results in an average loss per allotment of $6,616. We believe this to be woefully understated, probably not within 50 percent of the proper amount. Computations on ranch economics in this report failed to properly consider many aspects of the situation, including effects on profitability, improvement on replacement livestock, animal health, and animal breeding.

G-22 The ranch economic effects in the EIS were developed through a CSU computer program, and are identified as estimates. The program is discussed in Appendix SE-1 (page 357) and is available for inspection in the Montrose District Office.

G-23 Long term vegetation condition improvement figures are, at best, very rough estimates whose validity will be greatly affected by reliability of present estimates, weather and climatic patterns, and many other imponderables.

Long term reductions in runoff and sediment are really rough guesses with such remote probability of any reliability that no figures should have been listed in the report. Soil compaction changes and aquatic habitat improvement are also no more accurate than educated gusses would produce.

The amount of long term increases in grazing allocations is based on the rough estimates of vegetative improvement and is not reasonably reliable. Believable figures on present wildlife use are not presently available, and any future forecasts of wildlife use and hunting day increases are only base conjectures. The amount of increases in ranch income is once again little more than a gestimate. The cost of implementing this alternative is probably not accurate within 50 percent.

G-23 See page 83, Assumption #10.

G-24 On Alternative 3, no action, proper assessment of this alternative is impossible because of lack of long term trend data on the part of the BLM, lack of personal knowledge by BLM personnel of allotments and past use of them, and lack of any reasonable past direction and supervision of allotments by BLM personnel. Should the same level of range management by the BLM continue in the future as it has in the past on many allotments, all evaluations on each of the alternatives will undoubtedly prove invalid. For instance, on our Allotment Number 6208, the BLM has not spent one cent on range improvement in the past 9 years in spite of our many requests for needed improvements. BLM assessments of our range condition and trend are invalid because they are based on very little information. In the case of Allotment 6208 being a 1955 range study, a 1978 range analysis, and SCS general study of the Gunnison area, we have got a 23-year gap there. On Mill Creek Allotment Number 6213, even less data is available. The 1978 range studies lack reasonable validity because they were not properly adjusted to reflect the extreme drought in the Gunnison area, being one of the worst on record. Also, the studies were not inclusive enough over each allotment, studying insufficient numbers of test sights with such sights not properly distributed over the allotment to provide good cross-section evaluation. Test sites tend to be close to roads, stock trails, riparian areas and water holes. Sufficient sites were lacking in more remote areas of allotments. Past and future management practices relating to herding, salting, and season of use are not adequately addressed in evaluation of this alternative.

G-24 See response to comments 7-1 and 7-2.

G-25 On this No Action Alternative, the assumption that ranch income would remain the same because numbers would remain the same typifies the kind of erroneous estimates and conclusions which appear through the report. This was based on assumption of a long term declining trend, which if true over a period of many years, would result in lighter gains in calf weights, which would certainly reduce income, as any rancher knows.

G-25 See response to comment G-22.

G-26 Ten years ago the best minds of our state wildlife people had no idea of the present burgeoning elk problem in Gunnison County with unchanged BLM grazing policies. This being the case, how can the BLM with much less information, control, and expertise have any confidence that their projections in wildlife use bear any validity?

G-26 See response to comment 5-1.

G-27 The objectives should provide for management to provide for full use of all resources consistent with maintaining the total resource base in acceptable condition.

G-27 The objectives as stated in Chapter 1 of the EIS are specific only to the rangeland management program for the area. The overall Management Framework Plan provides for the balanced use of all resources consistent with the objectives you propose.

G-28 In the case of allotments 6208 and 6213, substantial areas of each have not been visited, inventoried, or studied by BLM personnel in many years, if ever.

G-28 See response to comment 7-1.

G-29 The Step II recommendations are meaningless without proper inventory. This, in large measure, probably accounts for the failure to include among the alternatives--Continue Livestock Grazing at Present Levels and Accomplish Various Rangeland Improvements and Management Changes. The development of MFP alternatives certainly should be considered with that alternative.

G-29 See response to comment G-19.

G-30 In many cases little, or no past information on many allotments was available to the BLM. Such information was either lost or never assembled by the BLM in spite of the fact that most permittees believed the BLM had much information relating to use, conditions, and trend of their allotments. Lacking such solid information, the BLM made range studies in 1978 to base their decisions on and used any other information they could get their hands on. The agency could not temper this information with personal knowledge of many allotments, becuase agency personnel had not been on many allotments for several years prior to 1978. The 1978 information was not properly adjusted to reflect the drought even though the BLM made some attempt to do so.

G-30 See response to comments 7-1 and 10-3.

G-31 Add the alternative to Continue Livestock Grazing at Present Levels and Accomplish Various Rangeland Improvements and Management Changes.

G-31 See response to comment G-28.

G-32 Include in appendix a breakdown of all data contined in the file of each allotment.

G-32 The data are available for inspection at the Montrose District. Size and cost restrictions preclude printing it in the EIS.

G-33 Include data and discussion relating to the ramifications of grazing reduction on the way of life in Gunnison County including the effect of such cuts on ranching meadowland maintenance, and abandonment and their consequence on growth and development.

G-33 See response to comment 7-9.

G-34 Where discussions or recommendations are based upon "apparent" observations, estimates, or fragmentary data, each such discussion or recommendation should clearly identify such observation, reference, or fragmentary data, and point out the possible errors resulting from their use. Under this change, no definitive actions should be proposed which will result in reduction in grazing numbers or substantive change in grazing practice. Rather, the status quo should be maintained until such "apparent" observations, estimates, or fragmentary data can be upgraded in reliability and completeness.

G-34 See response to comment 7-1.

G-35 Any measurement provided in the report should provide the date of the measurement, how it was made, and unusual circumstances affecting it, and whether it is considered typical or average for the season or year. For instance, stream flow figures of 7.1 cfs in West Antelope, while perhaps accurately measured at that time, was the average flows--only average flows--of only about 25 percent of that amount.

G-35 These data are available in the URAs for this area, located and available for inspection in the Montrose District Office.

G-36 A more equitable treatment of grazing is indicated. To accomplish this it will be necessary to provide reasonable balance to the list of preparers by adding more individuals with backgrounds in Range Science and responsibilities for livestock grazing. The present grouping of the list of preparers does not allow reasonable balance.

G-36 See response to comments 7-19 and M-1.

G-37 And my seventn one, and this is difficult, which is to present the draft statement in the simplest terms as is reasonably possible to lay people who are most critically affected by it, the rancher permittees. In other words, I don't think that we all handle the King's English as some of the experts in this, and whether it is a field of expertise or not, every effort to be should be made to state this thing simply. As Mr. Harris pointed out, abbreviations are not good. We can't go through an appendix of a 125 pages to find out what this abbreviation is.

G-37 The EIS was written in a manner to inform both the lay person and the technician. Appendices and references are intended to provide additional information. Abbreviations are used to save space, and are held to those in common usage. They are spelled out on first use in each section and are defined in the glossary, which is listed in the table of contents.

G-38 I see nowhere in this draft EIS where consultations or recommendations of our BLM Advisory Board have been considered or even asked for.

G-38 Throughout the planning and EIS process numerous contacts were made with the Advisory Board and with individual members of the Advisory Board. An Advisory Board tour was taken in the EIS area during EIS preparation (summer 1979).

Norma Swanson

G-39 I would like to bring out that that was not an average year that the study was done, in terms o rainfall. I think that that needs to be reviewed, and I would like to urge you to listen to the landowners at present and to listen to their suggestions and their ideas rather than just making an arbitrary statement.

G-39 See response to comment 7-1.

ERRATA

Final Gunnison Basin Livestock Grazing Environmental Impact Statement

The following are text changes to be used with the Oraft Gunnison Basin Livestock Grazing EIS. The changes are identified by page number, column, paragraph, and sentence. Where a change was made in response to a specific comment, that comment is also identified.

Page	Comment	Correction
3	9-21	On recommendation #1, column one, add "Razor Creek"; in column four, line ten, after "West Antelope Creek", add "Razor Creek".
9	M-2	First column, first paragraph, fourth line: replace "with fall rest--" with "livestock grazing management program recommended in the MFP, with fall rest--".
9		Second column, fifth paragraph, fourth line: change "non-intensive" to "less-intensive".
13,25	M-12	Replace tables 2-3 (page 13) and 2-7 (page 25) in the draft with revised tables 2-3 and 2-7 (attached at the end of the errata section).
15	M-3	First column, first paragraph, ninth line: "Trilica" should be "Trlica".
16	M-6	First column, second paragraph, third line: "Rearl" should be "Kearl".
16	6-1	First column, third paragraph, thirteenth line: change "75-foot buffer strip" to "100-foot buffer strip".
16		First column, third paragraph, seventeenth line: change "7" to "5".
16		First column, fourth paragraph twelfth line: replace "BLM Manuals 7331" with "Departmental Manual 517DM".
16		Second column, first line: replace "7411" with "Washington Office Instruction Memo 79-495 dated June 1979".
17	M-8	First column, second paragraph, twelfth line, change "with two mouldboard plows." to "with a two bottomed mouldboard plow."
17		Second column, third paragrpah: delete last sentence.
17		Second column, fifth paragraph: delete last sentence.
18		First column, first paragraph: delete last sentence.
18		Second column, fifth paragraph, first sentence: between "reservoirs" and "would", insert ", depending on soil conditions and objectives of the project,".
21		#6, first sentence insert, "within the first cycle of the grazing system" between "year" and "would". Remove second sentence. #8, second sentence, substitute "recognized grazing capacity" for "flexibility provision (not in excess of 15 percent)".
27	M-13	First column, third paragraph, eighteenth line: "Trilica" should be "Trlica".
27	17-7	Second column, third paragraph, sixteenth line: add "no greater than 60 percent (stem count method) of the".
34		First column, first paragraph, fifth line: delete "water quality and increase water quantity." Add "watershed values."
37	1-1	First column, second paragraph, first sentence: replace "Colorado State Water Engineer", with "Division Water Court." Second sentence: replace "District" with "Division".
47		Second column, third paragraph, first line: change "range survey" to "ecological site inventory". Last paragraph, first line: change "range survey" to " "ecological site inventory".
50		First column, second full paragraph, first line, and third paragraph, fourth line: change "range survey" to "ecological site inventory"; third paragraph, eleventh line: change "survey" to "inventory".
59		First column, third paragraph, seventh line: delete "Nearly".
60		Second column, third paragraph, last sentence: replace "yield" with "production".
61		Second column, second paragraph twelfth line: change "ground water runoff" to "ground water flow".
69	M-21	Second column, second full paragraph, first line: change "121 livestock operators" to "125 livestock operators".
73	M-22	First column, second paragraph, second line: "calf" should be "calve".
107		First column, fourth paragraph, first line: replace "15,444" with "15,471".
115		Second column, seventh paragraph, second line: replace "17,514" with "15,471".
116		First column, second line: replace "15,491" with "15,471".
177		Add to glossary (following "Grazing System"): "Ground Water Flow: The discharge of water from a ground water storage zone."
290		Premise #3, second paragraph, first sentence, last word: change "decrease" to "increase".
389	7-6	Add to Map 5: "The data on this map were based on information provided to BLM by the Colorado DOW and field studies conducted by BLM during the summer of 1978."
393		Map 7 legend: the keys for intermittant and perennial streams is reversed; intermittant streams should be represented on the map by a dotted blue line and perennial streams should be represented by a solid blue line.

TABLE 2-3

MINIMUM SPRING REST/GRAZE PERIOD

SCHEDULE - G

Alternative Period of Use-Possible Combinations	Most Critical Period of Plant Growth 7/1-7/15 Start of Grazing Period	Second Most Critical Period of Plant Growth 7/16-7/31	Third Most Critical Period of Plant Growth 8/1-8/15	Non-Critical Period of Plant Growth 8/16-On End of Grazing Period
G-1	1/ (3/1)	(2/2)	(1/3)	(0/1)
G-2	(3/1)	(2/2)	(1/3)	
G-3	2/ (2/1)	(1/2)		
G-4	(1/1)			
G-5		(1/1)		
G-6	(2/1)		(1/2)	
F-7	(2/1)		(I/2)	(0/1)
G-8				(0/1)
G-9			(1/1)	(0/I)
G-10		(2/1)	(1/2)	(0/1)

1/ 3/1 = Rest (yrs.)/Grazed (yrs.)
2/ Rest requirement for critical periods grazed, e.g., under Alternative G-3 the 7/1-7/15 period is the most critical period grazed and hence is the period during which rest must occur for two (2) years following one (1) year grazed. The 7/16-7/31 period is the next most critical period grazed and required one (1) year rest. During the period 7/16-7/31 for every two (2) years grazed.
//// Graze
Blank Rest

TABLE 2-7

MINIMUM FALL REST/GRAZE PERIOD - SCHEDULE G

Alternative Period Of Use - Possible Combinations	Third Most Critical Period of Plant Growth 7/1-7/15 Start of Grazing Period	Second Most Critical Period of Plant Growth 7/16-7/31	Most Critical Period of Plant Growth 8/1-8/15	Non-Critical Period of Plant Growth 8/16-On End of Grazing Period
G-1	1/ (1/3)	(2/2)	(3/1)	(0/1)
G-2	(1/3)	(2/2)	(3/1)	
G-3	(1/2)	2/ (2/1)		
G-4	(1/I)			
G-5		(1/1)		
G-6	(1/2)		(2/1)	
G-7	(1/2)		(2/1)	(0/1)
G-8				(0/1)
G-9			(1/1)	(0/1)
G-10		(1/2)	(2/1)	(0/1)

1/ 1/3 = Rest (yrs.)/Grazed (yrs.)
2/ Rest requirement for critical periods grazed, e.g., under alternative G-3 the 7/16-7/31 period is the most critical grazed and hence is the period during which rest must occur for 2 years following one year grazed. The 7/I-7/15 period is the next most critical period grazed and requires one (1) year rest. During the period 7/1-7/15 for every two (2) year grazed.
//// Graze
Blank Rest

APPENDIX CRM-1

Advisory
Council On
Historic
Preservation

1522 K Street N.W.
Washington D.C.
20005

PROGRAMMATIC MEMORANDUM OF AGREEMENT
BETWEEN THE
DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT,
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
AND THE
NATIONAL CONFERENCE OF STATE HISTORIC PRESERVATION OFFICERS
REGARDING THE
LIVESTOCK GRAZING AND RANGE IMPROVEMENT PROGRAM

WHEREAS, the Department of the Interior, Bureau of land Management, administers public lands, principally in the 11 Western States and Alaska, under concepts of multiple-use and sustained yield, and, among other responsibilities, the Bureau of Land Management is charged with management of rangeland and forage products under the Taylor Grazing Act of 1934 (43 U.S.C. 315) and the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701), which also charges the Bureau of Land Management with the management and protection of cultural resources; and

WHEREAS, Section 106 of the National Historic Preservation Act (16 U.S.C. 470f, as amended, 90 Stat. 1320) requires that the head of any Federal agency having direct or indirect jurisdiction over a proposed Federal, federally assisted, or federally licensed undertaking affecting properties in or eligible for the National Register of Historic Places shall afford the Advisory Council on Historic Preservation (hereafter Council) a reasonable opportunity for comment; and

WHEREAS, livestock grazing and range improvement activities undertaken by the Bureau of Land Management may have an effect upon properties in or eligible for the National Register of Historic Places and will require compliance with Section 106 of the National Historic Preservation Act, Section 2 of Executive Order 11593, May 13, 1971, "Protection and Enhancement of the Cultural Environment," and the Council's regulations, "Protection of Historic and Cultural Properties" (36 CFR Part 800); and

WHEREAS, the Bureau of Land Management is currently engaged in an ongoing program of rangeland management which involves the preparation, by 1988, of approximately 145 environmental statements on specific areas where grazing is permitted on approximately 174 million acres of public lands in the Western States and has requested Council review of the rangeland management program; and

WHEREAS, the Council and the Bureau of Land Management have met and reviewed the livestock grazing and range improvement program of the Bureau of Land Management and its relation to compliance with Section 106 of the National Historic Preservation Act of 1966 and Executive Order 11593, as implemented by the Council's regulations (36 CFR Part 800) and the responsibilities for historic and cultural resources under the National Environmental Policy Act of 1969 (42 U.S.C. 4321) as implemented by the Council on Environmental Quality in the "National Environmental Policy Act Regulations" (40 CFR Parts 1500-1508).

NOW, THEREFORE, it is mutually agreed that the Bureau of Land Management will ensure, through the stipulations outlined in this Programmatic Memorandum of Agreement, that historic and cultural properties will be given adequate consideration in grazing management program decisions and implementation which includes, but is not limited to, the preparation of grazing environmental statements, thereby meeting its responsibilities under Section 106 of the National Historic Preservation Act.

STIPULATIONS

1. The Bureau of Land Management will conduct Class I (existing data inventory) and Class II (sampling field inventory) inventories of historic and cultural properties, as specified in BLM Manual Section 8111, to be completed at the appropriate planning stage and prior to the preparation of the draft environmental statement. Inventory results will be evaluated, in consultation with the appropriate State Historic Preservation Officer, to identify properties included in or eligible for inclusion in the National Register of Historic Places.

   a. The inventory requirement may be modified on a case by case basis for interim grazing environmental statements (i.e., those prepared during fiscal years 1979 through 1981) if an alternative is acceptable to the appropriate State Historic Preservation Officer.

   b. If an acceptable alternative cannot be negotiated with the appropriate State Historic Preservation Officer, then the Bureau of Land Management will proceed with the preparation of the environmental statement and request the comments of the Council in accordance with 36 CFR 800. The Council's comments will be included in the final environmental statement.

2. This Programmatic Memorandum of Agreement and the inventory reports identifying historic and cultural properties will be referenced in each environmental statement.

3. Prior to commencement of any range improvement activities which involve land disturbance, the Bureau of Land Management will conduct a Class III inventory, as specified in the BLM Manual Section 8111.4, supplementing previous surveys to locate, identify, and evaluate properties in the impact area that may be eligible for inclusion in the National Register of Historic Places. Range improvement activities which involve land disturbance include, but are not limited to, such activities as construction of fencing and corrals, water development, chaining, and controlled burning. If properties that may be eligible for the National Register are found, the Bureau of Land Management will consult with the appropriate State Historic Preservation Officer and forward the documentation to the Keeper of the National Register to obtain a determination of eligibility in accordance with 36 CFR Part 63.

4. The Bureau of Land Management will provide the appropriate State Historic Preservation Officer with copies of the reports of the Class I, II, and III inventories in accordance with Sections 102(a)(2) and 202(c)(9) of the Federal Land Policy and Management Act of 1976 for inclusion as part of the State inventory conducted pursuant to 36 CFR Part 61.

5. The Bureau of Land Management will design the livestock grazing and range improvement program to avoid adverse effects on properties included in or eligible for inclusion in the National Register of Historic Places, unless this is not prudent or feasible.

6. Where it is not prudent or feasible to avoid adverse effects on properties included in or eligible for inclusion in the National Register of Historic Places as part of a livestock grazing and range improvement program authorization and the property is not a National Historic Landmark or National Historic Site, the Bureau of Land Management will consult with the appropriate State Historic Preservation Officer and will:

   a. Develop mutually acceptable measures to mitigate the impact of the proposed action; and

   b. Notify the Council in writing of agreements reached with the State Historic Preservation Officer under the provisions of 6(a) above. The Council need not be afforded further opportunity for review and comment.

7. The provisions of this Programmatic Memorandum of Agreement shall apply to the States of Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming.

8. If it is determined that the affected property is a National Historic Landmark or National Historic Site, or agreement cannot be reached between the Bureau of Land Management and the appropriate State Historic Preservation Officer on satisfactory mitigation measures, the Bureau of Land Management will request the comments of the Council in accordance with 36 CFR Part 800.

9. At the request of the President or a Member of Congress, the Council may advise the Bureau of Land Management, that a particular action, authorized by a grazing permit or lease, will require individual review and comment pursuant to 36 CFR Part 800. In that event, the Bureau of Land Management will comply with the provisions of the Council's regulations.

10. The Council and the Bureau of Land Management will review the provisions of this Agreement on an annual basis to determine whether modification or termination is appropriate. Should the current livestock grazing program of the Bureau of Land Management be revised, the ratifying parties will mutually determine whether the provisions of the Agreement will continue to apply.

Robert Tom Weaver 8/20/79
Deputy Executive Director (date)
Advisory Council on Historic
Preservation

Associate Ed Hastey 12/21/79
Director, Bureau of Land Management (date)

[signature] 8/26/79
President, National Conference of (date)
State Historic Preservation Officers

[signature] 1/14/80
Chairman (date)
Advisory Council on Historic
Preservation

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(June 1984)

BORROWER'S

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3-22-88	Keith Tyler 918-7
	Tulsa D.O.due:4-5

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GUNNISON BASIN RESOURCE AREA — NORTH 1/2

MAP SYMBOLS

Feature	Symbol	Feature	Symbol	Feature	Symbol	Feature	Symbol	Feature	Symbol
District Boundary		Road All Weather	Graded / Unimproved	Principal Access	Graded / Unimproved	Buildings		Towns and Cities	
National or State Boundary		Road Seasonal Use				Buildings (Abandoned)		River or Large Stream	
		Road 4 WD, Primitive		Road Interchange		BLM Office		Stream	
Continental Divide		Trail		Rest Area		School		Large Dam	
County Boundary		Railroad Double Track				Church		Reservoir or Retension Dam	
Land Grant		Railroad Single Track				Radio Installation		Lake or Pond	
Miscellaneous (Reservation, etc.)		Glacier		Levee or Dike		Fire Lookout (Primary)		Intermittent Lake or Pond	
Park (State, County or Local)		Road Bridge		Corral		Fire Lookout (Secondary)		Dry Lake or Pond	
Township and Range	Surveyed / Protracted	Railroad Bridge		Recreation Site		Fire Tool Cache		Marsh	
Section	Surveyed / Protracted	Ford Bridge		Tanks (Labeled as to type)		Shelter		Spring	
Section, Status, Subdivision		Ferry		Oil or Gas Wells		Cliff Dwelling		Improved Spring	
Section Identification	6	Road Ford		Mine or Quarry		Ruins Small / Large	Point / Ruins	Well	
State plane Coordinates and Zone	1 500,000 E	Trail Ford		US Mineral Location or Monument Entered Object (Labeled)		Cemetery	CEM	Airmail Well	
Boundary Monument		Road Tunnel				Sawmill		Windmill	
Route Marker Interstate		Railroad Tunnel		Triangulation Station	Obs	Au field		Aqueduct Tunnel	
Route Marker U.S.				Bluffs or Cliffs				Ditch or Canal	
Route Marker State		Prominent Peak		Prominent Ridge		Gaging Station		Aqueduct	

0 1 2 3 4 5 MILES

1:100,000

RECOGNITION:
SOURCE OF INFORMATION: OFFICE OF SPECIAL MAPPING, DENVER SERVICE CENTER, AND OTHER BLM RECORDS

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R. 8 W. R. 7 W. R. 6 W. R. 5½ W. R. 5 W. R. 4 W. R. 3 W. R. 2 W. R. 1 W. R. 1 E. R. 2 E. R. 3 E. R. 4 E.

T. 49 N.
T. 48 N.
T. 47 N.
T. 46 N.
T. 45 N.
T. 44 N.
T. 43 N.
T. 41 N.
T. 40 N.

THIS PORTION OF THE MAP CONTINUED ON THIS INSERT

R. 8 W. R. 7 W. R. 6 W. T. 41 N.

T. 40 N.

0 1 2 3 4 MILES

N

Proposed Spring Development
Proposed Well Development
Proposed Stock Reservoir
Proposed Fence
Proposed Water Pipeline

Cattleguards are proposed where Fences would cross heavily used roads, however, they are not shown due to map scale.

Public Lands (Administered by the Bureau of Land Management)
State Lands
National Forest Lands
Forest Recreation Area
Private Lands

GUNNISON BASIN RESOURCE AREA — SOUTH 1/2

RECOGNITION
SOURCE OF INFORMATION: OFFICE OF SPECIAL MAPPING, DENVER SERVICE CENTER, AND OTHER BLM RECORDS

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